

## Contents

Contents .....	1
EXECUTIVE SUMMARY .....	3
BACKGROUND INFORMATION .....	6
Site location and description .....	7
Details of proposal .....	9
Planning history of the site, and adjoining or nearby sites .....	14
KEY ISSUES FOR CONSIDERATION .....	14
Summary of main issues .....	14
Legal context .....	15
Planning policy .....	15
ASSESSMENT .....	17
Principle of the proposed development in terms of land use .....	17
Affordable workspace .....	19
Environmental impact assessment .....	20
Design .....	22
Impact of proposed development on amenity of adjoining occupiers and surrounding area .....	50
Energy and sustainability .....	69
Planning obligations (S.106 agreement) .....	73
Mayoral and borough community infrastructure levy (CIL) .....	76
Community involvement and engagement .....	76
Consultation responses from local groups .....	79
Community impact and equalities assessment .....	83
Human rights implications .....	84
Positive and proactive statement .....	84
Positive and proactive engagement: summary table .....	84
CONCLUSION .....	85
BACKGROUND INFORMATION .....	87
BACKGROUND DOCUMENTS .....	87
APPENDICES .....	88
AUDIT TRAIL .....	88

<b>Item No.</b>	<b>Classification:</b>	<b>Date:</b>	<b>Meeting Name:</b>
6.1	OPEN	24 April 2023	Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 19/AP/0404 for: Full Planning Application</p> <p><b>Address:</b> 40-44 BERMONDSEY STREET VINEGAR YARD WAREHOUSE 9-17 VINEGAR YARD AND LAND ADJACENT TO 1-7 SNOWFIELDS SE1.</p> <p><b>Proposal:</b> Refurbishment and extension of existing Vinegar Yard Warehouse (equivalent of 7 storeys and 26.188m AOD), demolition of 42-44 Bermondsey Street and retention and extension of 40 Bermondsey Street to form two buildings (equivalent of 12 storeys and 50.425m AOD) to provide office space (Class E); retail space (Class E); new landscaping and public realm including a new pedestrianised route through the site; vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.</p>		
<b>Ward(s) or groups affected:</b>	London Bridge and West Bermondsey		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	08/03/2019	<b>PPA Expiry Date</b>	31 October 2023
<b>Earliest Decision Date</b>			

## RECOMMENDATION

1. That planning permission is GRANTED subject to conditions, referral to the Mayor of London and the applicant entering into an appropriate legal agreement; and
2. That environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the Planning Committee in making their decision has due regard to the potential Equalities impacts that are outlined in this report; and
4. That following the issue of planning permission, the Director of Planning and Growth write to the Secretary of State notifying them of the Decision, pursuant to Regulation 30(1)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and
5. That following issue of planning permission, the Director of Planning and Growth place a statement on the Statutory Register pursuant to Regulation 28(1) of the

TCP (EIA) Regulations 2017, which contains the information required by Regulation 28 and, for the purposes of Regulation 28(1)(h) being the main reasons and considerations on which the Planning Committee's decision was based shall be set out in the report; and

6. That, in the event that the requirements of (1) are not met by 31<sup>st</sup> October 2023 that the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out in Paragraph 317 of this report

## **EXECUTIVE SUMMARY**

7. When originally submitted in February 2019, the application sought detailed planning permission for:
  4. Demolition of existing buildings at 40-44 Bermondsey Street including partial demolition, rebuilding and refurbishment of existing Vinegar Yard Warehouse and erection of three new buildings (two linked) with up to two levels of basement and heights ranging from five storeys (24.2m AOD) to 17 storeys (67m AOD) to provide office space (Class B1); flexible retail space (Classes A1/A2/A3/A4/A5); new landscaping and public realm; reconfigured pedestrian and vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.
  8. This application sought the full demolition of the Bermondsey Street buildings and replacement with two linked mixed use office and retail buildings rising to a total height of 10 storeys and 44.05m (AOD). The Vinegar Yard Warehouse would have been retained and extended vertically by 13 storeys to bring the total height to 17 storeys and 67m (AOD).
  9. The originally proposed development was recommended for approval by officers and it was intended that this would be presented to Planning Committee on the 29 June 2020 however members resolved to defer a decision on the application so that amendments could be considered to address the significant local concerns. The required amendments were summarised as:
    - Reduction in the height of the extension to the Vinegar Yard Warehouse with no development or massing taking place directly above the existing building.
    - Change to the materiality of the Bermondsey Street Building principally removing the proposal to use glass bricks and instead focussing on masonry to be more contextual with the surrounding buildings.
    - Realignment of the new route from Bermondsey Street to Snowsfields to take the form of a traditional yard.
  10. Subsequent to the deferral, the applicant has appointed a new design team and the scheme has been fully revised. Taking into account the comments made on deferral of the application, the scheme amendments include:
    11.
      - Removal of the vertical extension to the Vinegar Yard Warehouse in lieu of a six storey side extension as well as retention and refurbishment of the warehouse. The proposed extension would be a total height of 26.188m and would represent a reduction in height from the previous proposal of

40.8m

- Redesign of the Bermondsey Street buildings, including retention and reuse of No. 40 Bermondsey Street as well as recessive upward extensions to bring the building to 11 storeys and a maximum height of 50.425m (AOD). This would retain the masonry brick structure and façade of the Bermondsey Street building.
- Realignment of the proposed new route from Bermondsey Street to Snowsfields from a diagonal route to a perpendicular/dog leg route.

12. The development has been significantly reduced in scale and quantum. The table below demonstrates the changes to the scale and quantum of development.

Proposed Use	Original Scheme	Revised Proposals
Class B /Class E Office	21,522sqm	15,716sqm
Class A1-4/Class E Retail	1,281sqm	351sqm
Total	22,803sqm	16,067sqm
Building Heights	Original Scheme	Revised Proposals
Bermondsey Street Building	5/10 storeys + basement	5/11 storeys + basement
Vinegar Yard Warehouse Extension	17 storeys + basement	6 storeys + basement

13. The proposal would continue to be for a large commercial development comprising mainly office with some ancillary retail use at ground floor level across two buildings, a retained/refurbished and extended Vinegar Yard Warehouse and a new building on Bermondsey Street that retains No. 40 Bermondsey Street. At 11 commercial storeys, the Bermondsey Street building would be classed as a tall building.
14. The proposed development would be a constituent part of a wider development framework that covers the eastern St Thomas Street area running from Weston Street to Bermondsey Street and includes the neighbouring sites known as Capital House; Becket House; and Vinegar Yard. The sites' landowners have sought to coordinate an approach for comprehensive redevelopment and have established a framework for developing the area.
15. The framework envisages a series of individual buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields and define a public garden to the rear towards Melior Street and a new public plaza towards Snowsfields. It retains north-south routes across the site and sought a new east-west pedestrian route that bisects the framework area, linking Weston Street with the two new public spaces and through to Bermondsey Street. The application site is only partially located within a conservation area (Vinegar Yard Warehouse) and does not contain any listed buildings. The Bermondsey Street conservation area sits to the south and the east of the Bermondsey Street site.
16. The development would retain and fully refurbish the Vinegar yard Warehouse, an important local building that has a historic character and is considered to be a local heritage asset that contributes positively to the Bermondsey Street Conservation Area.
17. As with all buildings of this scale within Central London, the design is required to

be of the highest standards and this has been achieved as part of the revised proposals. The proposed office accommodation would be of a high standard and would meet the needs of modern office users. The development would include 10% of the office floorspace as affordable workspace which would meet the demands of micro to medium sized businesses as well as start-ups and enterprises looking to expand.

18. The development would be highly energy efficient and sustainable with an on-site carbon reduction of 54% above the 2013 Building Regulations in addition to a carbon offset payment that would help the development achieve Carbon Zero targets. It is expected that the development would achieve BREEAM 'Excellent' and this would be a conditioned requirement of any consent.
19. The site is located in the Central Activities Zone, the Bankside Borough and London Bridge Opportunity Area and partially within the London Bridge District Town Centre and site allocation NSP54 of the Southwark Plan 2022. The proposals are consistent with the site allocation and the objectives of the development plan for this area.
20. The impact on the amenity of neighbours in terms of daylight and sunlight is set out in the report, and it is noted that the daylight/sunlight impacts on a small number of residential properties closest to the site are significant, being categorised as moderate effects in the Addendum ES. These impacts should be considered in the context of the character of the area in line with the flexibility expected by the BRE when looking at dense urban environments. These impacts also need to be balanced against the significant benefits of delivering this scheme.

Use Class	Existing sqm	Proposed sqm	Change +/-
Use Class E (a) to (f) retail/financial services	0	351	+351
Use Class E (g) i) Office	2,015	15,716	+13,701
Affordable workspace Use Class E	0	1,572	+1,572
Sui Generis	460	0	-460
Construction Jobs		592 per annum	
Operational Jobs		915	

CO2 Savings beyond part L Bldg. Regs.	Bermondsey Street – 52% improvement Vinegar Yard Warehouse – 63% improvement Combined – 54%
Trees lost	5
Trees gained	21

	Existing	Proposed	Change +/-
Urban Greening Factor	n/a	0.36	n/a

Public open space	158m2 (this is pavement to the edge BY building)	331m2	173m3
Greenfield Run Off Rate	1.22l/s	1.22l/s	0
Green/Brown Roofs	0	1,677m2	+ 1,677m2
EVCPS (on site)		1	
Cycle parking spaces		354 long stay 71 short stay	

CIL (estimated)	£148,583.41
MCIL (estimated)	£772,801.57
S106	

21. A total of 1,371 letters were sent to local residents as part of a neighbour notification exercise on the revised proposals and this was initially undertaken on 11 October 2022 and repeated on 24 November 2022 following concerns that some neighbours had not received their initial letter. Following the submission of summary information, re-consultation was undertaken again on 27 January 2023 and further repeated again on the 22 March 2023. Taking together the consultation responses on the original submission and the revised proposals, a total of 272 objections have been received as well as 23 representations of support. The main points of the objections are set out below along with the number of times they have been raised.

22.

Objection topic	Number of time raised	
	Original submission	Revised proposals
Heritage and conservation area impacts	75	39
Height/scale/massing	52	71
Out of character with the area	37	63
Daylight/sunlight/overshadowing	30	27
Wind	27	8
Disruption during and after construction	26	9
Transport and traffic impacts	20	12
Insufficient benefits/no justification	16	5
Overdevelopment	15	14
Noise	14	6
Detailed design	12	19
Overbearing	12	8
Views	11	14
Consultation	10	14
Privacy	10	15
Public realm	6	6
Cumulative impacts	5	0
Air quality	4	3
Trees and landscaping	4	3
Ecology	-	1
Infrastructure/local services	-	4

## BACKGROUND INFORMATION

## Site location and description

23. The application site relates to two plots of land divided by Snowsfields. The plot to the west of Snowsfields is known as the Snowsfields site and the plot to the east is known as the Bermondsey Street site. The comprehensive application site (the site) lies to the south of London Bridge Station close to the junction of St Thomas Street, Snowsfields, Bermondsey Street and Crucifix Lane.
24. The Snowsfields site is bounded by Snowsfields on the south/east and Vinegar Yard to the north/west. The site is currently occupied by the building known as the Vinegar Yard warehouse which extends to four storeys in height with an additional semi basement level. The warehouse is currently vacant due to its poor state of repair and various structural issues. The remainder of the plot consists of hard standing. Adjacent to the warehouse to the west is the Horseshoe Inn and to the south is a four storey building with a bar/restaurant on the ground floor and homes on the upper levels. To the north of the site, on the opposite side of Vinegar Yard, is a larger cleared site which is currently in temporary use as a market and food/beverage outlet. There is a cycle hire docking station with capacity for 31 cycles adjacent to the site on Snowsfields. Buildings in the immediate vicinity of the Snowsfields site range in height from three to six storeys.

### Image – Location Plan

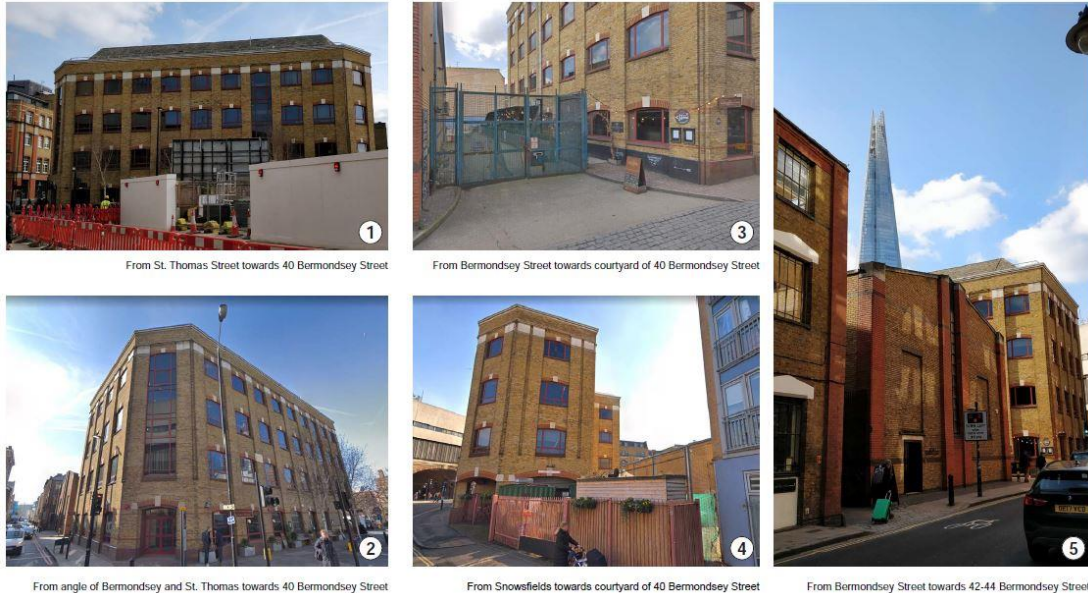


25. The Bermondsey Street site is bounded by Bermondsey Street to the east, the junction of Bermondsey Street/St Thomas Street and Crucifix Lane to the north and Snowsfields to the west. The Bermondsey Street site is currently occupied by two buildings and a large yard area. The building at the south end of the plot is a warehouse building comprising offices whilst the building to the north is a four storey building with retail at ground floor level and offices on the upper levels. The Bermondsey Street site is adjacent to existing residential buildings to the west at Raquel Court and Hardwidge Street whilst Bermondsey Street to the east



accommodates a range of uses including retail, cultural space, offices, and residential. The Wine and Spirit Education Trust is located adjacent to the site on Bermondsey Street. Buildings in the immediate vicinity of the Bermondsey Street site range in height from four to six storeys.

Image – Existing buildings Bermondsey Street



26. The Bermondsey Street site lies adjacent to the Bermondsey Street Conservation Area on its south and east boundaries. On the Snowsfields Site, the part of the plot occupied by the Vinegar Warehouse sits within the Bermondsey Street Conservation Area which recognises the heritage value of both the Vinegar Warehouse and the Horseshoe Inn which are classed as undesignated heritage assets.
27. The surrounding area is characterised by a range of uses including retail, office, cultural, education and residential. The northern end of Bermondsey Street is dominated by the London Bridge Station railway viaduct, the arches of which have been redeveloped into new retail outlets as part of the station refurbishment.
28. In terms of accessibility, the application site benefits from the highest level of public transport accessibility with a PTAL rating of 6B reflecting the proximity of London Bridge Railway Station and associated Jubilee and Northern lines of the London Underground. Bus routes are available to the north of the site on Tooley Street and west on Borough High Street.



## Image – Existing Vinegar Yard Warehouse



From Snowsfields towards the Leather Warehouse



From Vinegar Yard towards the Leather Warehouse



From Hardwidge Street towards the Leather Warehouse



From Mellor Street towards the Leather Warehouse

## Details of proposal

29. Planning consent is sought for the refurbishment and extension of existing Vinegar Yard Warehouse, demolition of 42-44 Bermondsey Street and retention and extension of 40 Bermondsey Street to form two buildings with up to two levels of basement and heights ranging from six storeys (AOD 26.188) at the Vinegar Yard Warehouse to eleven storeys (AOD 50.425) on the Bermondsey Street buildings in order to provide office space (Class E); retail space (Class E); new landscaping and public realm including new pedestrianised route through the site; vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.
30. The development would be formed of two buildings. The Bermondsey Street Building and the Vinegar Yard Warehouse with its proposed extension. Snowsfields would separate the two constituent parts of the site.
31. The Bermondsey Street building would involve the demolition of 42-44 Bermondsey Street and the retention of 40 Bermondsey Street. This would be supplemented by a stepped extension taking the building to a total of 11 storeys in height (50.425m AOD). The Bermondsey Street building would provide 12,922sqm of office (Class E) floorspace and 351sqm of retail/restaurant (Class E) floorspace.

32. The building would incorporate part retail use and an office reception at ground floor, with office use on all upper levels. Office amenity terraces would be provided on levels 4, 6, 8, 10, and 11. A new public pedestrian route that reinstates the historic street pattern would be provided through the site at ground level from Bermondsey Street to Snowsfields.
33. Cycle parking would be located at ground level with associated changing and shower facilities at basement level along with refuse areas. A loading bay accessed from Snowsfields would provide access to an on-site servicing area. All plant would be located at the lower basement and roof level.
34. On the Vinegar Yard Warehouse site, the development would include the retention and refurbishment of the Vinegar Yard Warehouse and the provision of a new side extension up to a total of six storeys (26.188m AOD). The Vinegar Yard Warehouse and extension would deliver 2,794sqm of office (Class E) floorspace. Offices would be located on floors one to five and an office amenity terrace would be provided at roof level. A new 172sqm public realm area would be provided adjacent to the warehouse at ground level. Cycle parking facilities and associated spaces would be located at basement level. All servicing would take place from an on-street loading bay positioned adjacent to the site on Snowsfields.

### Amendments to the application

35. As detailed in the Executive Summary above, various scheme amendments have taken place in order to address the concerns raised by members when the application was deferred. These amendments include:
  - Removal of the vertical extension to the Vinegar Yard Warehouse in lieu of a six storey side extension as well as retention and refurbishment of the warehouse. The proposed extension would be a total height of 26.188m and would represent a reduction in height from the previous proposal of 40.8m
  - Redesign of the Bermondsey Street buildings, including retention and reuse of No. 40 Bermondsey Street as well as recessive upward extensions to bring the building to 11 storeys and a maximum height of 50.425m (AOD). This would retain the masonry brick structure and façade of the Bermondsey Street building.
  - Realignment of the proposed new route from Bermondsey Street to Snowsfields from a diagonal route to a perpendicular/dog leg route.

Image – Comparison with original scheme (Vinegar Yard Warehouse)



RPSW designed warehouse scheme



Amended warehouse scheme, without any development over the warehouse itself

Image – Comparison with original scheme (Bermondsey Street)



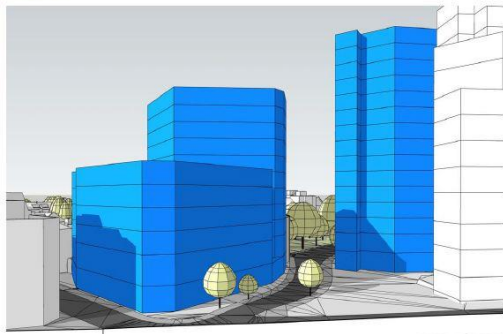
RPSW designed material, incorporating glass bricks



Amended material - masonry design to lower floors

Image – Massing comparison with original scheme

RENZO PIANO BUILDING WORKSHOP  
February 2020



6 / 11 storey building at Bermondsey Yards, and 15 storey Leather Warehouse

STUDIO RHE + JRA  
April 2022



Refine the environment of the internal street beneath the Bermondsey Yards building. Develop the facade retention detailing.

## Consultation responses from members of the public and local groups

36. As set out previously, taking together the consultation responses on the original submission and the revised proposals, a total of 272 objections have been received as well as 23 representations of support. The main points of the objections are set out below.

- The development would be excessive in terms of height, scale and massing.
- Harm character and setting of the conservation area.
- The development would harm heritage assets.
- The proposed development would have an adverse impact on the Vinegar Yard Warehouse which is a heritage asset with a positive contribution to the Conservation Area and local character.
- The development would cause harm to views.
- The proposal is overdevelopment.
- The development would be out of character with the area.
- The loss of five existing trees is unacceptable.
- The development would result in a loss of daylight and sunlight as well as create overshadowing.
- The development would result in traffic and transport problems.
- The development would not have active frontages at ground level.
- The proposed development would be very overbearing in nature.
- The proposed materials are poor quality and inappropriate.
- The materials for the scheme are very dark and will make people miserable.
- The Construction Management Plan is insufficient and could lead to adverse impacts.
- The various schemes for St Thomas Street should be considered together.
- The development would have an adverse impact on public transport which is already overcrowded.
- The Vinegar Yard Warehouse should be painted hot pink and orange.
- The tree species are not appropriate.
- There would be disruption and disturbance during construction.
- There will be antisocial behaviour from people in the bars.
- The development would create adverse wind impacts.
- The landscaping drawings misrepresent the proposal.
- The local streets and services are not equipped for the increase in population.
- The extension to the Vinegar Yard Warehouse is too tall.
- The public realm and landscaping are poor quality and inadequate.
- There would be an impact on people's privacy.
- There would be an increase in noise disturbance.
- Affordable housing contributions should be secured.
- Nothing has changed between this application and the last one.
- Consultation and engagement has not been sufficient.
- The development is of a poor quality design.
- There is not enough retail space.
- As much historic fabric as possible should be retained in the old



warehouse.

- The development should have been designed as two separate sites.
- The proposal is devoid of character
- There would be a loss of outlook for local residents.
- The refurbishment of the warehouse would be tokenistic.
- There would be increased pollution.
- The development would adversely affect local business and make it difficult for them to hire and retain the best staff and offer them a suitable work life balance due to the impacts on the local area. The visuals submitted with the application are misleading.
- The servicing arrangements are poorly designed.
- The proposed development would impact on the development potential of the Raquel Court site.
- It is not clear how the impacts of the development will be managed should the St Thomas Street developments come forward for development at the same time.
- The building should be future proofed for net zero carbon emissions.
- The area does not need any more commercial or retail space.
- New residents will compete for spaces in schools and doctors surgeries.
- The Council should give weight to the Supreme Court Judgement regarding nuisance overlooking from the Tate Modern.
- The energy and sustainability proposals are unacceptable and insufficient.
- The proposal would result in air pollution and would compromise air quality.
- There would be impacts in terms of light pollution.
- The development would cause increased congestion, noise and air pollution.
- The benefits of the proposed development would not outweigh the harm caused.
- The independent nature of Bermondsey Street should be protected.
- The proposed extensions would fail to harmonise with the scale and architectural style of the original buildings.
- The extensions would fail to harmonise with the character of the area, including respecting the historic pattern of the surrounding area and the established character and streetscene of this part of Bermondsey Street.
- The extensions would not successfully integrate with their surroundings and should read as if it were part of the original buildings.
- The extensions would fail to respect the amenity of neighbouring properties.
- Extensions should be subordinate to the original building and play a “supporting role” to the original dwelling in terms of location, form and scale.

37. The main points made in support of the development are as follows:

- The scheme generally reflects the rich urban grain that is London Bridge.
- The proposed mix of new and old buildings should provide a lively and varied built environment.

- The development would contribute positively to the established character of London Bridge.
- The combination of traditional materials with more modern materials will also add variety.
- The inclusion of new public open space is welcome.
- The proposed covered pedestrian yard to Bermondsey Street has the potential to be a successful addition to the retail experience in the area.
- The development looks good and is a high quality design.
- The development would bring much-needed commercial traffic to the area, supporting local businesses and adding to the already vibrant street life of Bermondsey.
- The positive effects would far outweigh any objections.
- The Vinegar Yard Warehouse would once again be given life.
- The proposal is a clever and sensitive design.
- The stepped-back nature of the upper floors mitigates any objections on the grounds of height and would minimise the visual impact from street level.
- The development would increase jobs
- The new building offers planting which is an improvement on the existing building.
- A modern building would improve the overall carbon efficiency of the buildings in Southwark.
- The development would have excellent access to public transport. The development will fit in with the surrounding context.
- The new buildings sit in harmony with the existing buildings in the local area.

### **Planning history of the site, and adjoining or nearby sites.**

38. Any decisions which are significant to the consideration of the current application are referred to within the relevant sections of the report. A fuller history of decisions relating to this site, and other nearby sites, is provided in Appendix 3.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

The main issues to be considered in respect of this application are:

- Principle of the proposed development in terms of land use;
- Environmental impact assessment;
- Design, layout, heritage assets and impact on Borough and London views;
- Landscaping and trees;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport and highways;
- Noise and vibration;
- Energy and sustainability;
- Ecology and biodiversity;



- Air quality;
- Ground conditions and contamination;
- Water resources and flood risk;
- Archaeology;
- Wind microclimate;
- Planning obligations (S.106 undertaking or agreement);
- Mayoral and borough community infrastructure levy (CIL);
- Community involvement and engagement;
- Consultation responses, and how the application addresses the concerns raised;
- Community impact and equalities assessment;
- Human rights;
- All other relevant material planning considerations

39. These matters are discussed in detail in the ‘Assessment’ section of this report.

### **Legal context**

40. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021 and the Southwark Plan 2022. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
41. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Planning policy**

42. The statutory development plans for the Borough comprise the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework (2021) and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

### **Site designations**

- Air Quality Management Area
- Bankside, Borough and London Bridge Strategic Cultural Area (Vinegar Yard Warehouse Site)
- Bankside, Borough and London Bridge Opportunity Area
- Borough, Bermondsey and Rivers Archaeological Priority Zone

- Central Activities Zone
- London Bridge District Town Centre (Vinegar Yard Warehouse Site)
- The Thames Special Policy Area
- London Bridge Area Vision AV.11 (Vinegar Yard Warehouse)
- Bermondsey Area Vision AV.03 (Bermondsey Street building)

43. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however it benefits from protection by the Thames Barrier.

#### The Southwark Plan Site Allocation NSP54

44. The Vinegar Yard Warehouse portion of the site benefits from an allocation within the Southwark Plan 2022. Allocation NSP54 requires redevelopment to:

- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
- Provide a new north-south green link from Melior Place to St Thomas Street; and
- Enhance St Thomas Street by providing high quality public realm and active frontages including retail, community, medical or healthcare or leisure uses (as defined in the glossary) at ground floor; and
- Provide new open space of at least 15% of the site area – 605sqm.

45. NSP54 primarily covers the much larger Vinegar Yard site to the north, taking in the St Thomas Street frontage. Only the southern section of NSP54 relates to the current application, taking in that portion of the site that is occupied by the Vinegar Yard Warehouse.

#### Listed Buildings

46. The following listed buildings are adjacent to the site:

- London bridge Station, Platforms 9-16 (Brighton Side) – Grade II
- 55 Bermondsey Street – Grade II
- Numbers 59, 61 and 63 Bermondsey Street and attached railings – Grade II
- 68-76 Bermondsey Street – Grade II

#### Conservation Areas

47. The site is partially located within the Bermondsey Street Conservation Area. The Tooley Street Conservation Area is located to the north on the opposite side of London Bridge Railway Station.

#### London View Management Framework

48. The application site is located with LVMF protected view 2A.1 from Parliament Hill summit to St Paul's Cathedral, and 3A.1 from Kenwood viewing gazebo to St Paul's Cathedral.

## ASSESSMENT

### Principle of the proposed development in terms of land use

#### Relevant policy designations

49. The redevelopment of the site would be office led and would generate a significant uplift in employment floorspace as well as new retail space. The new public realm and pedestrian routes would significantly improve the street level experience of this area and would improve animation, activity and interest at street level in addition to improving pedestrian connectivity and legibility.

#### *CAZ, District Town Centre and Opportunity Area*

50. The National Planning Policy Framework (NPPF) was updated in 2021. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

51. The application site is part of the London Central Activities Zone and the Bankside, Borough and London Bridge Opportunity Area. The Vinegar Yard Warehouse portion of the site is also located within the London Bridge District Town Centre and the London Bridge Area Vision catchment (AV.11). The Bermondsey Street site is located with the Bermondsey Area Vision catchment (AV.03). London Bridge has the potential to grow its strategic office provision, shops, leisure, culture, science and medical facilities. The site allocations in London Bridge will deliver around 57,000sqm (gross) offices and employment workspaces, 2,100sqm (gross) retail, community and leisure floorspace and up to 10,000 new jobs.

#### *Southwark Plan Site Allocation NSP54*

52. As stated previously, the Vinegar Yard Warehouse portion of the site sites within the NSP54 site allocation. NSP54 primarily covers the much larger Vinegar Yard site to the north, taking in the St Thomas Street frontage. Only the southern section of NSP54 relates to the current application, taking in that portion of the site that is occupied by the Vinegar Yard Warehouse. The allocation sets out that development of NSP54 must:

- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
- Provide a new north-south green link from Melior Place to St Thomas Street; and
- Enhance St Thomas Street by providing high quality public realm and active frontages including retail, community, medical or healthcare or leisure uses (as defined in the glossary) at ground floor; and
- Provide new open space of at least 15% of the site area – 605sqm.

53. The site allocation also sets out that the development 'should' provide housing as opposed to it being a mandatory requirement under 'must'. The larger Vinegar Yard site is being considered by the GLA for offices under a separate application. The retention of the Vinegar Yard Warehouse is a priority for the current development and the refurbishment and retention of the warehouse does not lend itself to conversion for housing. On this basis, the objectives of the site allocation are considered to be met with regards to the small portion of the allocation that falls within the current development site. The retention of the warehouse for office space as well as increased office space as a result of the six storey side extension meet the 50% requirement. The extension, which fronts Snowfields, would not fetter the ability of the larger Vinegar Yard development to the north to provide the north south linkages required by the allocation. The 15% open space requirement would be satisfied.

#### Conclusion on policy designations

54. The principle of a development containing a mix of uses including Class E office space, Class E retail, Class E restaurant/café would support the role and functioning of the Central Activities Zone as being consistent with the policies for the Opportunity Area and the site allocation. The acceptability of each use will be considered below.

#### Offices

55. Promoting the economy and creating employment opportunities is a key priority for the planning system. The site lies within a London Plan Opportunity Area (Policy SD1) and partially within a District Town Centre (Policy SD6). London Plan Policy GG5 requires local planning authorities to plan for sufficient employment and industrial spaces to support economic growth whilst Policies E1 and E2 deal specifically with the provision of B Use Class (now called Class E(g) since the change to the Use Classes Order in 2021). London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases.
56. Southwark Plan Policy SP4 seeks to ensure that Southwark can develop a strong, green and inclusive economy. To achieve this the development plan aims to deliver at least 460,000sqm of new office space between 2019 and 2036 (equating to around 35,500 jobs). The policy states that around 80% of new offices will be delivered in the Central Activities Zone and sets a strategic target of 10,000 new jobs for the Borough, Bankside and London Bridge Opportunity Area. Policy SP4 further requires 10% of all new employment floorspace to be affordable workspace for start-ups and existing and new small and independent businesses in Southwark. Finally, the policy identifies the CAZ and district town centres as appropriate for delivering approximately 19,670sqm of retail floorspace.
57. The aforementioned London Plan and Southwark Plan policies support the provision of a commercial led development on this site. The existing buildings taken together provide approximately 1,493sqm of vacant warehouse

floorspace within the Vinegar yard Warehouse and 2,015sqm of office floorspace within the Bermondsey Street building. The Vinegar Yard Warehouse building is in poor condition and vacant and in its current state cannot be occupied. The proposed development would provide 15,716sqm (GIA) of Class E(g) office floorspace that would have the potential to support up to 915 jobs once operational. This represents an uplift in office employment floorspace of approximately 13,701sqm. This uplift in employment floorspace as well as increased job provision would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs and high quality office space within the Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area and is a welcome benefit of the development.

## Retail

58. The existing building provides 460sqm of retail floorspace in the form of a bar/restaurant. The proposed development would provide 351sqm of retail space and whilst this is a reduction on the current provision it is not so significant that it would harm the vitality or viability of the Bermondsey Street retail offer.

## Affordable workspace

59. London Plan Policy E2 requires the provision of a range of low-cost Class B1 business space to be supported to meet the needs of micro, small and medium sized enterprises and to support firms wishing to start up and expand. The policy states “development proposals for new B1 business floor space greater than 2,500sqm, or a locally determined lower threshold in a local development plan document, should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.
60. Policy E3 of the London Plan deals specifically with affordable workspace. The policy states “In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes”. The policy identifies the circumstances in which it would be appropriate to secure affordable space.
61. Southwark Plan Policy P31 deals with affordable workspace. Criterion 2 of the policy requires Major ‘B Use Class’ development proposals to deliver at least 10% of the floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. The space should be offered to existing business on site first and then small and independent local businesses. Only where on-site provision would be impracticable are developers permitted to make a payment in lieu of the on-site provision.
62. In exceptional circumstances affordable retail, affordable cultural uses, or public health services which provide a range of affordable access options for local residents, may be provided as an alternative to affordable workspace (employment uses). This will only be acceptable if there is a demonstrated need for the affordable use proposed and with a named occupier. If the alternative affordable use is no longer required in the future, the space should be made

available for affordable workspace (employment uses).

63. The proposed development would provide a total of 15,716sqm of employment floorspace and as such a total of 1,572sqm of affordable workspace should be provided in order to comply with planning policy. The applicant proposes to offer this fully on site at ground and first floor. This would be offered on a 25% discount on market rent for a period of 30 years and meets the Southwark plan 10% requirement.
64. The Class E(g) office space and affordable retail unit would be offered at a 75% discount on market rent with relevant stair casing from a peppercorn rent to the 75% level over the course of a 24 month period as set out below:
- 0-6 months at 100% discount (rent free period);
  - 7-13 months at 60% discount on the Local Open Market Rent;
  - 14-22 months at 40% discount on the Local Open Market Rent; and
  - From month 23 onwards at 75% of the Local Open Market Rent.
65. In addition, the Section 106 Agreement would include an Affordable Workspace Strategy. This would ensure, among other things, that:
- the workspace is provided for a 30-year period at the discounts set out above;
  - no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
  - detailed plans showing final location of affordable workspace;
  - a management plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
  - appropriate marketing of the affordable workspace will be conducted; and
  - the rates and service charges payable by the tenant will be capped.

## **Environmental impact assessment**

66. Environmental Impact Assessment is a statutory procedure that provides for a process assesses and reports upon the beneficial and adverse (positive and negative) environmental effects of development projects. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to its potential for likely significant environmental effects.
67. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has undertaken an Environmental Impact Assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
68. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. This includes the 2019 ES and addendums as well as the Addendum ES that accompanies the revised proposals.



69. The Addendum ES considers the need for the re-assessment of significant effects on the environment as documented in the 2019 ES and supporting Addenda. It describes the scope of the EIA and presents updates to certain parts of the EIA as appropriate based on:
- The nature of the changes between the 2019 design and the currently proposed design material changes or updates to existing planning policy, including the 2021 London Plan<sup>1</sup> and The Southwark Plan 2022;
  - material changes in EIA technical practice;
  - material changes or updates to baseline environmental conditions; and
  - material changes to the list of cumulative developments previously assessed.
70. Together, these various documents constitute the ES that has allowed a full Environmental impact Assessment to be undertaken by officers and this information has been taken into account in reaching the proposed recommendation. Officers are satisfied that, with the addendum ES, the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.
71. Where the findings of the original ES are still relevant this will be stated explicitly in the relevant following chapters and assessments. Where topics have been reassessed due to changes in the outcomes as a result of the revised proposals then this will be set out in full.

#### *Alternatives*

72. The EIA Regulations requires the ES to provide information on the alternative options considered by the applicant. The 'Do Nothing' alternative would leave the application site in its current state. This scenario is considered in the ES to have no environmental benefits compared with the proposed redevelopment of the site.
73. The ES also describes the design evolution of the scheme as well as environmental factors including townscape; wind microclimate; daylight and sunlight; impacts on views; and air quality. This has been further adapted by virtue of the revised proposals. The original scheme was been informed by testing various options and having full regard to the constraints and opportunities presented by the site as well as issues raised during the process. The revised proposals have considered these issues and the scheme revisions were informed by the previous ES. Where relevant, potential effects have been set out in the Addendum ES.
74. Officers are satisfied that the full ES (2019 ES, Addendum ES and relevant addenda) has investigated alternatives for the site and that the proposed development maximises the development potential of the site whilst seeking to minimise environmental impacts. The site occupies a prominent central London location in the Bankside, Borough and London Bridge Opportunity Area. To not develop the site would lead to a missed opportunity to secure a high quality scheme.

#### *Cumulative impacts*

75. The 2019 ES and Addendum ES both consider cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments. The list of cumulative schemes has been updated from the 2019 ES and is set out at Appendix C of the Addendum ES. As with the 2019 ES, in most cases the cumulative impacts of the development were limited. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations.

### *Conclusions on the EIA*

76. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal.

## **Design**

77. The NPPF stresses that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping.
78. The importance of good design is further reinforced in the Southwark Plan Policies P13 and P14 which require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore all new development must be attractive, safe and fully accessible and inclusive for all.

## **Site context**

79. London Plan Policy D3 requires developments to make the most efficient use of land to optimise density, using an assessment of site context and a design-led approach and this is reflected in Southwark Plan Policy P18.
80. The site sits within the varied context of the Grade II listed railway arches on St Thomas Street and Crucifix Lane opposite to the north; a mixture of modest-scaled, repurposed workshops and warehousing, and housing and social infrastructure that date from the mid Victorian period through to the 1930s to the south and east; and a series of hoarded development sites along St Thomas Street to the west, including Vinegar Yard site with its meanwhile food and

beverage market; and the 1980s, 16-storey Wolfson House (Guy's Hospital) at no.49 Weston Street beyond.

81. The application buildings, no.40 and 42-44 Bermondsey Street sit outside but immediately adjacent to the Bermondsey Street conservation area, which runs along the full length of Bermondsey Street to Crucifix Lane on its east side but stops short of the application buildings on its west side. However, the site's mid-Victorian warehouse on Vinegar Yard is within the conservation area, which includes the building in a spur that also includes the Horseshoe Public House and its neighbour, no.1-7 Fenning Street and the buildings that front onto the south side of Weston Street. The site's Vinegar Yard Warehouse building is regarded as a positive contributor to the conservation area.
82. Tooley Street and its conservation area are located just to the north of the site, immediately beyond London Bridge station and its viaducts; whilst Borough Conservation Area and Tower Bridge Conservation Area are located some 400m to the west and northeast respectively. The site falls within the Central Activities Zone (CAZ) which is characterised in this location by a rich mix of historic and modern buildings, streets and places; the vibrancy and diversity of its uses; and by landmark buildings and infrastructure, including most noticeably the Shard, which dominates the skyline with its monumental scale and outstanding architecture.
83. The scheme was initially conceived as part of a wider development framework that ran between Weston Street to the west and the head of Bermondsey Street to the east and included the neighbouring development plots of Capital House, Becket House and Vinegar Yard. The sites' landowners sought to coordinate an approach for comprehensive redevelopment and established a masterplan for the area.
84. At the time, the masterplan envisaged a series of perimeter buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields and defined a public garden to the rear towards Weston Street and a new plaza space towards Snowsfields. It retained north-south routes across the site and opened up a new east-west pedestrian route that bisects the masterplan area, linking Weston Street with the two new public spaces and through to Bermondsey Street. The redevelopment schemes were mostly for commercial offices, but with significant elements of retail, leisure and student accommodation; and were mainly conceived as tall buildings.
85. The Council has granted consents for the redevelopment of Capital House and Becket House that generally align with the masterplan. The GLA has resolved to grant consent for the Vinegar Yard development for a large medical-use scheme in connection with Guy's Hospital, although the S.106 has yet to be agreed. However, in contrast to the masterplan and the initial application to the Council, the Vinegar Yard scheme retains no.1-7 Fenning Street, a two-storey Victorian warehouse, which is extended upwards and to the side, and has reduced the north-south route to a passageway that briefly passes through the side extension, as a semi-public lobby.
86. The masterplan intended a large plaza within Vinegar Yard and an onward

diagonal pedestrian link running through onto Bermondsey Street. A public space within Vinegar Yard and an onward route through to Bermondsey Street remain relevant, although the building forms and layout of the public realm are no longer as provisionally set out.

87. The general design intent for the application site similarly remains relevant. The scheme remains an important townscape moment, transitioning a shift in character and scale from the modern, headquarter style office developments emerging on St Thomas Street through to the more fine-grained, historic context of the adjoining Bermondsey conservation area. It blends old and new architecture, hi-rise and modest scales, and street-based buildings. It is intended to moderate the otherwise marked changes in townscape and character, albeit refocussed on the Bermondsey Street buildings.

### Site layout

88. The revised development's layout is well conceived and remains a distinct improvement on the present condition of a mainly disengaged and under-utilised site. The new layout promotes good urban design, with a coherent arrangement of legible new buildings and spaces that provide an engaging, functional and safe public realm.
89. As previously, the development adopts a perimeter block layout, where the retained and new buildings respond to the general street form and building alignment, promoting a strongly defined public realm. The warehouse is refurbished and its site hoardings removed, re-establishing the building's positive relationship with Vinegar Yard; whilst its extended form to the south replaces the former car park, infilling the unattractive gap in the street scene and re-establishing the common building line along Snowsfields.
90. The corner building of no.40 Bermondsey Street is retained, maintaining the current, strong definition of this important street corner of St Thomas Street with Bermondsey Street and Snowsfields, with its chamfered built form that reflects the Edwardian building on the opposite corner (no.35-37 Bermondsey Street), which is a positive move. The replacement built form at no.42-44 is inserted in alignment with no.40, maintaining the building line along Bermondsey Street, whilst the 'rear' extension is inserted onto Snowsfields in alignment with the flank façade of no.40, re-establishing a common building line along the street, which is welcome.
91. The new feature of the revised layout is the reimagining of the pedestrian link that connects Bermondsey Street with Snowsfields. In the revised proposals it adopts the more informal character that cuts beneath a building and leads to a central space that is open to the sky, reflecting the service yard character that is typical of the local area and previously existed as White Lion Court until the 1940/50s. The route offers good local permeability and connectivity, without diluting the role of the perimeter streets as the primary thoroughfares and frontages. The reinstated 'yard' would offer an attractive alternative route for those pedestrians wishing to meander.

92. Importantly, the site layout provides a series of commercial entrances and shopfronts that support active street frontages and good informal surveillance of the surrounding public realm and the new 'yard'. The existing corner entrance of no.40 is retained, providing access to the ground floor retail/restaurant, and is supplemented by a further corner entrance onto the new yard further along Bermondsey Street. The replacement building at no.42-44 has a double-door entrance on Bermondsey Street to the offices, which is supplemented by a further entrance within the yard. The yard includes the entrance to the end-of-journey facilities (incl. cycle storage) for the main offices, as well as a secondary shopfront to the new café facility that is shared with the offices. The yard space itself is designed to accommodate pop-up kiosks, bringing additional activity to the route.
93. Regarding the Vinegar Yard Warehouse site, the main office entrance is onto Snowsfields, linking up with the adjacent retail parade and fostering its active street frontage. The main entrance sits diagonally across from the new yard and main building entrance of Bermondsey Street building, heightening the sense of activity at this point within the streetscape. Whilst the warehouse building itself does not feature a separate entrance, the intention is to refurbish the ground floor windows, bringing animation to the building's frontages and providing good informal surveillance of Vinegar Yard and its new public realm, and onto the adjoining passageway through to Melior Place. Servicing takes place on-street for the Vinegar Yard Warehouse site, whilst the Bermondsey Street building has a dedicated off-street loading bay, arranged to minimise its impact on the public realm.
94. Overall, the general layout is well-considered, fostering good permeability, a well-activated public realm and local distinctiveness. At grade, the proposed urban form is coherent and the urban design quality is high, and is welcomed, subject to conditions confirming the detailed treatments of the new entrances (incl. signage, gates for the pedestrian link, entrance canopies).

### Built form and scale

95. As referred to above, the focus for the floorspace increase has been shifted from the Vinegar Yard Warehouse site to the Bermondsey Street site, the intention being to better respect the former warehouse building and preserve the character of the local conservation area. The warehouse, with its polygonal massing and double-pitched roof, is largely retained in form and refurbished in appearance, and with its key internal features preserved where possible. The building's side extension is of a comparative scale to the host building, but is designed to read in part as a discrete building that complements the warehouse and to achieve a 'critical mass' that supports its functioning as a high quality office building.
96. The new addition is set slightly recessed behind the east façade of the warehouse, with the approximately 1m return working sufficiently well to maintain the visual prominence and sense of form of the warehouse onto Vinegar Yard. Similarly, the addition does not run the length of the host building's flank (south) elevation, but is set back approximately 2m from the chamfered corner,

preserving the appearance of and outlook from existing stacked corner windows. The addition has a comparatively simple footprint and massing, which extends out to the site's boundary onto Snowfields and is extruded upwards over six storeys. It is given a pitched roof with a gable end, replicating the roof form of the host building.

Image – Proposed Vinegar Yard Warehouse extension



Leather Warehouse with external staircase absorbed within the building

97. The extension is 7m taller than the host building, which is a reasonably modest difference. Importantly, its visual impact is softened by the setbacks and use of a similar roof form, and particularly by the discrete architectural appearance of the addition. In adopting a contrasting, but complementary design, the extension reads more as a moderately taller neighbouring building that adds to the fine grain appearance of the townscape.
98. Its scale does not overwhelm the host building or the adjacent public realm, particularly given the open character of Vinegar Yard, and sits comfortably within Snowfields, bookending the adjacent four storey parade. As such its height and massing are supported.
99. Looking at the Bermondsey Street building, the designs are intended to offer a street-based built form that extends to become a sculpted, large scale building in a highly engaging manner. The new building is 'grounded' in retaining the existing four storey warehouse-styled corner building (no.40), which is matched by a similar four storey new built form on the site of no.42-44. Together, at 16.5m to parapet level, the two volumes support the prevailing scale of Bermondsey Street, sufficiently reflecting the general shoulder height and fine grain built form



of the local context.

100. The main building volume is set back from the Bermondsey Street frontage and is massed as a series of double-storey layers that extend above in a doughnut and horseshoe arrangement, with the office floors wrapping around a central, open lightwell that sits above the midpoint of the new yard. The double-storey layers tier rearwards away from Bermondsey Street and inwards away from Snowfields, reducing the sense of height and bulk onto the two main frontages. The double-storey layers are cantilevered to further erode the massing and help create a series of large roof terraces that provide extensive greening and outdoor amenity for the building's occupiers. The highly articulated massing gives a dynamic built form that is distinctive and highly engaging, particularly when viewed from Vinegar Yard and along Snowfields.

Image – Proposed Bermondsey Street building



101. At 11 storeys (50.425m AOD), the new building on Bermondsey Street is taller than its immediate context. However, views of the additional scale are generally obscured by the dense form of the adjoining streets, with the sculpted built form of its upper storeys easing its sense of scale where visible. The application building would read as the outermost edge of a new cluster of tall buildings within the London Bridge station area that includes Wolfson House, Guys Tower and the Shard complex, and would be seen to graduate the building heights downwards towards the historic and more domestic scale of north Bermondsey. Its position on the junction with Snowfields would present a notable end-stop to this emerging context of tall buildings.

### Architectural quality

102. The derelict warehouse is retained and refurbished, with any dilapidated or heavily altered elements rebuilt to match the original and as many of its historic features restored or re-used as possible. Externally, the building's principal street facing brick elevations are retained and repaired, and its west elevation partly rebuilt. The external cranes, hatch rank doorways, segmented brick arches and York stone cills on its north and northeast elevations are refurbished and are reinstated on the east elevation where they are missing. The brickwork is gently cleaned, with the faded painted sign on the east elevation retained for visual interest. The building's cast iron and steel windows are replaced throughout, using steel Crittal windows to match, upgrading their performance. The existing roof form is proposed to be altered, removing one of the two double-pitches and flattening out the section of roof to provide a high-level terrace as an outdoor

amenity space for the new offices. The outer pitch (north) is retained, as are the front and rear gables and the pedimented upstand to the front, which will sufficiently preserve the distinctive roof profile. As such, when seen from the adjoining public realm, for the majority of the building its strong warehouse character and appearance is sustained.

Image - View looking east



103. The main exception is the building's south elevation, which is currently onto the area of hardstanding. The proposal is to partly demolish the elevation and to open up the building envelope to connect through to the new addition. As referenced above, the extension intentionally takes on a different architectural character, contrasting with the warehouse, but in an understated manner. The facades feature a simple, modern design, comprising curtain walling with bronze-coloured pressed metalwork cladding, partly wrapped on the west and south elevations by a four storey brickwork facade with punched-hole openings.
104. The curtain walling has a strong horizontal emphasis with its projecting top and bottom frames, which is enhanced by the glazed corner junctions of the south and east elevations. This horizontality is offset by the series of fine vertical metalwork fins set into the curtain wall framing and by the stacked arrangement and detailed design of the pressed metalwork cladding. The cladding features vertical joints and is set out to form a solid end section of wall that runs the height of the new extension adjacent to the warehouse (east elevation). It is also used to provide a more solid finish to the fifth floor and gable roof form.



Image – New yard



Amended Yard looking towards Snowsfields

105. The outcome is a sharply detailed, contemporary character, which is softened and contextualised in part by the multi-stock brickwork screen on the south and west façades. The extensive glazing and corner windows present an open aspect, animating the building, particularly on its junction with Snowsfields. Overall, the designs are a well-considered balance of visual robustness and transparency, and an engaging contrast to the refurbished warehouse. The designs are supported, subject to the detailing and material finishes of the curtain wall framing, cladding and brickwork.
106. In terms of functional quality, the proposals are to locate the entrance and lobby area, stairs and lift cores, ancillary services (incl. toilets) and meeting room spaces within the new extension. This frees the warehouse to provide high quality, flexible office floorspace, benefitting from its open plan form, large openable windows and attractive features (incl. characterful cast iron columns and timber beams). Services will be exposed, maintaining the high ceilings, although the space will mainly be naturally ventilated. Access to the office floorspace is provided through the partly demolished south façade. A new basement is excavated beneath the extension, providing end-of-journey facilities and plant, whilst the large reception includes a café. As referenced earlier, the development includes a rooftop terrace, located above the warehouse, and accessed from the extension.
107. The Bermondsey Street building is complex, with the adaptation of the existing building at no.40, the insertion of a similar new four storey 'building' at no.42-44 and the intervening service yard link, and the tiered layering of the modern office floorplates with terraced gardens above. The design intention is to retain and augment the familiar warehouse-style corner building and to create a high-quality

modern office building that fronts onto Bermondsey Street, Snowfields and the new service yard in similar warehouse-styled brick façades, but which then emerges as a distinctly contemporary building above roof level.

108. Briefly taking the main elements in turn, no.40 is remodelled to provide a simple, modern but more contextual aesthetic. The interventions comprise the replacement of the building plinth's pink marble cladding in grey precast stone tiling and the staining of the adjacent brickwork to match; the insertion of a precast stone lintels and matching stringer above the ground floor windows; the replacement of the column capitals with brickwork to match; the replacement of the corbelling above the top window heads in precast stone; and the introduction of simple precast stone cornice and coping details. The window openings are lengthened, with the removal of the brickwork arched lintels, and the windows refenestrated, incorporating an openable margin light. A double-height oriel window is inserted as a picture window for visual interest. The same design aesthetic is used to extend the street façade of no.40 along Snowfields, and for the public facades to the replacement no.42-44. Overall, the designs are effective and bring a more sober, contemporary character to the elevations that sit well with the warehouse character of Bermondsey Street.
109. Above parapet level, the new tall building emerges as a series of tiered floorplates, setback to maintain the building datum onto Bermondsey Street and Snowfields, and carved backwards to reduce overshadowing and sense of scale in immediate views. The tiers broadly step every two storeys in pairs. However, the façade designs are cleverly articulated to emphasize the upper floor of the pair and to play down the appearance of the corresponding lower floor. Whilst all finished in curtain walling, the upper floor incorporates solid metalwork panelling and parapet upstands, and modestly cantilevers above the lower floor. The latter is finished in clear curtain walling only, lightening its appearance in contrast to the upper floor. The effect is to visually erode the built form and give a dynamic quality to the building's appearance, which is engaging. Much will depend on the detailing of the curtain walling and soffit finishes of the cantilevers, which should be conditioned. The extensive perimeter planting and rooftop gardens soften the building's appearance and add further visual interest.
110. In terms of functional quality, the new building would comfortably achieve BREEAM 'Excellent' and is targeting an 'Outstanding' rating. The designs feature excellent internal ceiling heights and open-plan flexible office floorplates, with good daylight penetration, including from the open lightwell that drops through the centre of the building. The building features mixed-mode ventilation and exposed services, and benefits from the extensive provision of rooftop terrace gardens for amenity. The large reception area is accessed from the street and from the yard, and includes a café facility, whilst extensive end-of-journey facilities are provided within the basement. Overall, the functional quality is high and the architecture distinctive and engaging.

### Tall building

111. The Bermondsey Street building reaches a maximum of 47.5m above grade

(including rooftop plant) and is taller than its immediate context to the south and east, although the contextual scale rises eastwards towards Guy's Hospital and London Bridge station beyond. As a tall building, it is located within CAZ and the BBLB Opportunity Area where such high-rise intensification of development is generally appropriate. Nevertheless, the tall building is expected to also comply with policy P.17 in full. Looking at the policy requirements:

*Point of landmark significance*

112. The application site sits at the point of convergence of St Thomas Street, Crucifix Lane, Bermondsey Street and Snowsfields immediately to the south of London Bridge Station, one of London's major transport interchanges. As such the application site is considered to be a point of landmark significance and the site will be important in landmarking a 'gateway' into the St Thomas Street masterplan area from the south and west and in signifying the junction of St Thomas Street with Snowsfields and Bermondsey Street. Its landmark value is more in consolidating and marking the endpoint to the emerging cluster of tall buildings that collectively express the commercial hub of London Bridge.

*Proportionate in height*

113. At 11 office storeys (50.425m AODm) in height, the building is a moderately tall building and not especially tall compared to the proposed replacement buildings for Capital House (approximately 134m), Becket House (approximately 110m) or Vinegar Yard (approximately 94m). This more moderate scale works well, given its position on the edge of the emerging cluster and adjacency to historic Bermondsey Street. Its height serves to graduate the tall building heights down to the more traditional and domestic context, with the shoulder heights of the retained no.40 and its matching no.42-44 contributing to the effect. Furthermore, its height is sufficiently moderate to work well as a local landmark on the junction of Snowsfields/ Bermondsey Street and St Thomas Street and not to become overbearing in local views. Overall, its scale is considered proportionate to the significance of its location and size of site.

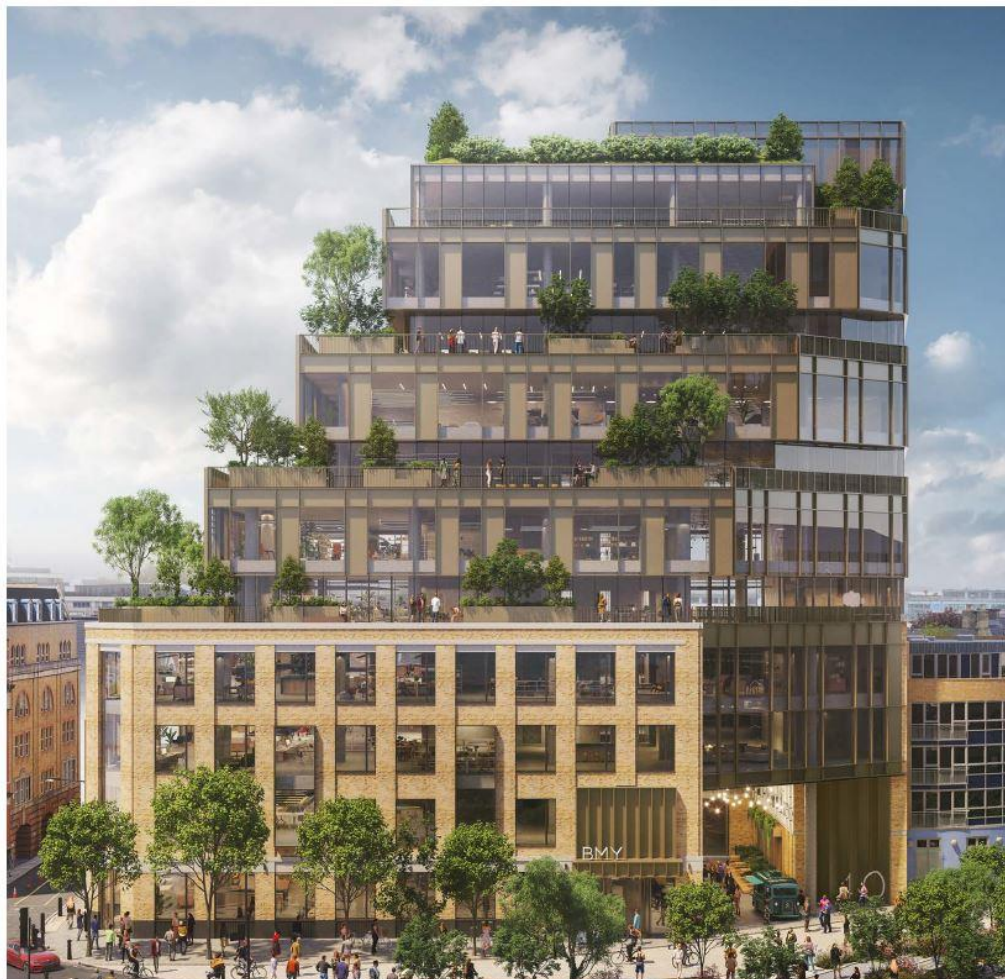
*Positive contribution to the London skyline*

114. Its contribution is positive, mediating the distinct change in scale and character from the modern, taller context of Guy's Tower and the Shard beyond down to the historic, finer grain of north Bermondsey, and providing an engaging end-stop to the tall building cluster. Furthermore, its extensively articulated built form and layering of planted terraces will bring a distinctive and pleasing appearance to the local skyline.

*Not cause harm to strategic or borough views*

115. As set out in more detail below, the revised scheme would have a negligible impact on strategic views, being just visible in several riverside prospects. Whilst it would be more evident in borough views, its appearance would not be harmful, and as such would be policy compliant.

Image – Bermondsey Street building



*Responds positively to local character and townscape*

116. The revised scheme responds positively by using the street-based architecture of nos. 40 and 42-44 to 'ground' its new tall building within the local context. The properties sit well within the street, responding to its built form and characterful appearance, with the remodelled no.40 and replacement no.42-44 adopting a contemporary, warehouse-style aesthetic. In addition, the buildings sit either side of a new pedestrian link, which is well conceived as a traditional-style service yard, adding to local distinctiveness.
117. Above this, the tall building is skilfully articulated to scale back from the street scene and to provide a distinctive and engaging architecture that works as a counter-point to the street-based buildings and offers a notable landmark where visible in the local townscape. The retention and refurbishment of the Vinegar Yard Warehouse also a positive contribution of the scheme as a whole.

*Provide functional and commensurate public space*

118. The development provides two notable extensions to the public realm: Most



significant is the new pedestrian route that runs through the Bermondsey Street site, linking to Snowfields. The 7m wide route is surfaced in decorative granite sett paving and adopts the character of a traditional service yard that cuts beneath the street buildings. Open to the public, the new through-route provides c.420sqm of public realm and includes informal seating and the opportunity for pop-up concessions, making for an appealing space. The route is secured out of hours with gating.

Image – Plan of open space



119. The removal of the hoarding on the Vinegar Yard Warehouse site opens up its north perimeter to provide approximately 170sqm of new public realm. The space is hard landscaped and features groups of new street trees, planting and bench seating, providing an attractive, informal public space that also improves pedestrian permeability through the area. In time, the space would be complemented by additional public realm created by the neighbouring Vinegar Yard site, once the CIT development comes forward.
120. Elsewhere, the development would extend the footway on the east side of Snowfields, providing approximately 160sqm of additional pavement space and the opportunity for new street tree planting, further softening the townscape. Overall, the landscape contribution is commensurate with the proposed scale of development.

*Provide new publically accessible space at or near the top*

121. The development does not incorporate any high-level viewing gallery or commercial use that would be open to the public. Whilst it includes a rooftop garden above the retained Vinegar Yard Warehouse and a series of gardens terraces on the upper floors of the Bermondsey Street building, the outdoor amenity would be available to the building occupiers only. As it is, the

development is for a moderately tall building and, although the outlook would include northward views towards the river, the vantage point gained would be of lesser public interest compared to the opportunity from other much taller buildings and structures within the London Bridge and Tower Bridge areas. Its policy requirement in this instance is therefore considered of lesser material weight.

*Exemplary architectural design*

122. The tall building is a well-designed modern building in terms of its functional quality and its architecture, offering a well-appointed contemporary headquarter office building, but with flexible floorplates that would support adaptation and sub-letting. The building is served by an appropriately sized lobby with the main entrance onto Snowfields and is supported by a secondary entrance onto the characterful service yard that also provides access to the basement end-of-journey facilities. The building has a dedicated off-street loading bay. The main office floors benefit from ceiling heights of 3.0-3.2m with underfloor services; large windows with the option of natural or mechanical ventilation; a large central lightwell, ensuring good levels of daylight throughout; and access to landscaped terraces on the 4<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup> 10<sup>th</sup> and 11<sup>th</sup> floor levels.
123. Regarding the elevational architecture, as set out earlier, it is well conceived and well detailed, with a high quality material palette. The architecture has a strong compositional quality, 'plugging' into the context of Bermondsey Street with its sober warehouse-style building frontages and characterful service yard with bridge links, and emerging above parapet level as a series of heavily articulated floors that cantilever and tier away in a series of layers to produce a highly dynamic and contrasting appearance. Its detailed finish is textured and contemporary, softened by the planted terraces. The outcome is effective and engaging.

*Conserve and enhance heritage assets and contribute to townscape character*

124. As set out in more detail below, the scheme has been revised to retain the Vinegar Yard Warehouse in a much more sensitive manner and to develop the adjacent open land as an extension that supports local distinctiveness within this part of the Bermondsey Street conservation area.
125. The Bermondsey Street site is outside, but adjacent to the conservation area. Its development as a tall building sits in contrast with the more traditional and domestic scale of the immediate surroundings. It works well as a notable local landmark in several townscape views. It is visible from within the adjacent conservation area and as such does affect its setting. Its sense of scale is eased by its articulated form and engaging appearance and it is considered that it is of limited harm to this setting. This impact is balanced against the contributions its street-based buildings and new yard make to the townscape character and the positive contributions made to the Snowfields site.

*Positive relationship with the public realm*

126. The development promotes a positive relationship with the public realm in several notable ways. Its design concept of 'grounding' the tall building as conventional street-based buildings with shopfronts onto Bermondsey Street and Snowsfields, providing activity onto and oversight of the adjacent public realm. The restaurant/retail entrance works particularly well positioned on the street corner, whilst the affordable office entrance adds to the rhythm of entrances along Bermondsey Street itself.
127. Secondly, the main offices present onto Snowsfields in a highly legible position, with the main entrance evident in views from St Thomas Street and across Vinegar Yard. Its large foyer should provide significant animation of the adjacent public realm.
128. Thirdly, in addition to activating the development's perimeter, the offices feature secondary entrances that activate the new pedestrian route that passes beneath the tall building. This new element of public realm further benefits from a café concession and a series of possible pop-ups that will bring activity and character to the new public realm.
129. Lastly, there is the positive relationship that the wider development makes, with the refurbishment and opening up of the Vinegar Yard Warehouse building, with its office entrance and café animating Snowsfields and new plaza space onto Vinegar Yard, and the warehouse providing oversight of the passageway through to Melior Place. Taken as a whole, the development achieves a notably high quality of urban design.
130. Overall, the development's designs sufficiently meet the policy criteria for a new tall building. However, a significant outcome of a tall building is its visibility and whilst this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets must be considered.

## **Heritage considerations**

131. The submission includes a Zone of Visual Influence (ZVI) and a townscape visual impact assessment (TVIA), both of which have been updated to take into account the revised design approach. The ZVI comprises a map indicating where in the surrounding area the new tall building would probably be visible from, but excludes the impacts of any tree cover. The TVIA provides 28 verified images of the development when viewed from chosen locations in and around the Bermondsey and London Bridge areas, and of relevant protected London panoramas.
132. In general, the development is less widely visible than expected for a tall building. In part, this is because of the large buildings located mainly to the north and west of the site that often mask the development from wider view. It is also a reflection of its proximity to the broad railway viaducts running into London Bridge Station and the tight, historical urban form to the south and east that offers limited visual prospects. Nonetheless, it is likely to remain sporadically visible along the

Thames riverfront around Potters Field, Tower of London and St Katherine's Dock; and occasionally in long distance views from Jamaica Road to the east, Bermondsey Spa to the southeast, Tabard Gardens, Great Dover Street, New Kent Road flyover and a number of intervening streets to the southwest where the roadway directly aligns with the site.

133. Of more significance, the development is visible in a number of nearby and middle distance views where it affects upon the settings of designated heritage assets and the local townscape. Looking briefly at the categories of views and townscape in turn:

*Impacts on Protected Views*

134. The LVMF seeks to protect and manage 27 views across London and some of its major landmarks. The submission demonstrates that at the proposed height the development will have no impact upon the selected protected views of St Paul's and little discernible impact upon London's riverside prospects.
135. In the panoramic view from Parliament Hill to St. Paul's (views #1, #1.1), although the development is in alignment with St Paul's, the new tall building would not be seen, being mostly obscured by buildings in the foreground, with its uppermost floors partly obscured by St Paul's itself and partly by the Shard in the cathedral's backdrop. Similarly, from Kenwood (views #2, #2.1) the proposed building is completely obscured from view by Cannon Street Station to the east of St Paul's, with the cathedral's setting unaffected.
136. Looking at the river prospects, from upstream the development is mostly obscured from view by no.3 More London when looking from Tower Bridge, emerging briefly to its west and above the tree cover, but sitting well below the general rooflines of the riverfront buildings and Strata building in the backdrop. It has a negligible impact on the panorama (view #11). It becomes completely obscured in the downstream view from Southwark Bridge (view 12), being completely obscured by Minerva House and the Shard complex in the middle ground.
137. Although not demonstrated by modelled or verified views, the development would be unlikely to have any notable impacts on the Borough's protected views of St Paul's, being outside the viewing corridor, or on the river prospects from King's Stairs Gardens or the Millennium Bridge. Whilst the tall building would be visible on the skyline from the elevated positions of Nunhead Cemetery and particularly One Tree Hill, it would be seen well away from St Paul's and read as part of the loose cluster of tall buildings around London Bridge Station. The ZVI indicates that the proposal would not be seen from the Millennium Bridge.

*Impacts on the World Heritage Site*

138. The Tower of London is a heritage asset of the highest order. It is Grade I statutory listed and is recognised internationally as a certified World Heritage Site

of Outstanding Universal Value. In such cases, any development that intrudes upon views within the Tower complex must be carefully considered.

139. In this instance, however, the development is not visible from within the tower complex. It remains sufficiently low on the skyline to be obscured from view by the tower's buildings and ramparts or by intervening buildings in the middle ground. As demonstrated by the views from within the Inner Ward towards the site of the scaffold (view #3) and the wider setting from the White Tower, the development would sit well below the roof profile of the Queen's House, extending only briefly to its west where it is nonetheless hidden behind the tower's ramparts and no.4 More London. In the view from Lanthorne Tower, the development remains fully below the ramparts (view #5); whilst from the ramparts themselves, the development is hidden from view behind no.3 More London (view #6).
140. The updated submission includes three selected views from nearby to the Tower of London, looking towards the development and showing the setting of the World Heritage Site. It is evident that the development has no effect on the World Heritage Site's setting in these views. From Tower Hill (view# 7) and Wakefield Gardens (view #8), the development is obscured from view by no.7 More London, whilst in the view of the Tower of London from the Mint (view #9) the proposed development is obscured by the historic complex itself.

*Impacts on local heritage assets - conservation areas and listed buildings*

141. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay "special regard to the desirability of preserving or enhancing the character or appearance of that area". Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have "
142. The NPPF (2021) provides guidance on how these tests are applied, referring in paras 199-202 to the need to give great weight to the conservation of the heritage asset, and the more important the asset, the greater the weight; evaluate the extent of harm or loss of its significance; generally refuse consent where the harm is substantial; and, where necessary, weigh the harm against the public benefits of the scheme. Para 203 addresses non-designated heritage assets (NDHA) and the effect an application may have on its significance, directly or indirectly. It advises on the need for a balanced judgement, "having regard to the scale of any harm or loss and the significance of the heritage asset".

*Conservation areas*

143. The Vinegar Yard Warehouse part of the application site is within the Bermondsey Street conservation area, which has the Church of St Mary Magdalen and the high street as its focus, but spurs both eastwards and westwards: The latter spur extends to include the Vinegar Yard Warehouse (no.9-17 Vinegar Yard). No.40 and no.42-44 Bermondsey Street are outside, but immediately adjacent to the conservation area.

144. The Conservation Area's special interest is its historic development of tightly packed 18th century housing, many with shops, and modest scaled late 19th/early 20th century warehouses and workshops that have adopted the medieval pattern of narrow streets and plots, arched alleyways and rear yards. The tight urban scale, simple classical architecture and industrial detailing have created an evocative and characterful townscape. All but cut-off from the riverside by the construction of London Bridge station in the 1830s, the area has evolved as a quiet hinterland; distinctly different in purpose, scale and character from the wharves, warehouses, institutions and commerce of the nearby Tooley Street and Tower Bridge conservation areas. As its CAA records, this clear change in character has prevailed and is made evident by the close proximity to the hub of activity and large developments associated with Guy's Hospital and the London Bridge area.
145. The Vinegar Yard Warehouse is identified within the Conservation Area Appraisal (CAA) as making a positive contribution to the local conservation area. Despite its current poor condition, the warehouse remains a robust, characterful stock brick building that clearly expresses its function, and is a strong reminder of the historical industrial character of this part of Bermondsey. The building is very much part of the character and appearance of the conservation area, and is regarded a non-designated heritage asset.
146. Looking at the revised scheme, the designs no-longer promote the oversailing of the warehouse and transforming it into a 17 storeys tall building, but relocates the tall building onto the adjacent Bermondsey Street site, outside the conservation area, and reduces its overall height to 11 storeys. In terms of the warehouse, the proposals take a significantly more sensitive approach of restoring and adapting the building for office use, incorporating a six storey side extension. The direct effect on the conservation area is beneficial, with the warehouse retained as a legible and distinct building within the streetscape and its positive contribution generally enhanced through its restoration and re-use.
147. The side extension is sizeable and affects the south elevation of the warehouse, requiring its partial demolition and obscuring it from view. However, the extension's built form and material finishes are well considered and its architecture is distinctive. Its quasi-industrial design is characterful and supports local distinctiveness. Overall, the extension is engaging, but remains sufficiently understated in its appearance (view #21). It sits well with the host building, contrasting in a complementary manner; and does not impose harmfully in the backdrop to the diminutive Horseshoe public house, including in the notable vista along Melior Street (view #23). Furthermore, it completes the fractured street scene within Snowfields, infilling an unsightly area of open space. Overall, the extension enhances the local townscape and preserves the setting of the adjacent conservation area.

Image – View from Bermondsey Street/Tanner Street Park



148. Regarding the Bermondsey Street site, overall, the scale, height and massing of the 11-storey height contrasts adversely with the low-rise, fine grain built form of the neighbouring Bermondsey Street conservation area, including its western spur into Vinegar Yard. That said, the tall building works hard to respond positively to its context and ease its impacts. The retention and remodelling of no.40 and matching replacement of no.42-44 as the tall building's base work well to maintain the streetscape within Bermondsey Street. The shoulder height and building frontages preserve the street's three-dimensional built form and architecture of robust, punched-hole brickwork elevations. The development also reintroduces the traditional-style service yard link, adding to the character and urban grain. It then looks to set back its tall building elements above parapet level, reducing its sense of scale onto Bermondsey Street. This works well to mitigate its impact in immediate views at the north end of Bermondsey Street.
149. In views from further south along Bermondsey Street, within the core of the conservation area, the building's high-rise form becomes more evident. The juxtaposition of scale is eased to an extent by the articulated form, with the high-level massing seen to cascade down onto Bermondsey Street rather than appear overbearing. The natural tones of the material cladding and inclusion of rooftop



planting also soften its appearance. Nonetheless, its appearance above the relatively consistent rooflines along Bermondsey Street does constitute a degree of harm however this would be at the lower end of less than substantial.

Image – View along Melior Street



150. In longer distance views along Bermondsey Street, it remains visible above the streetscape, although the impact becomes less pronounced as its form reads lower onto the existing roofline and its dark toned cladding allows it to blend more into the background. Importantly, other tall buildings, including the Shard and Guy's Tower break through the roofline, as will in time the consented schemes of Capital House and Becket House, lessening the impact (views #15-17). The building finally becomes obscured from view at the far end of Bermondsey Street and from within the churchyard grounds of St Mary Magdalene (view #14); while the other tall buildings within the London bridge area remain overt.
151. Elsewhere within the conservation area, the tall building will be seen rising directly above the Horseshoe Pub in the important townscape vista along Melior Street; its 11 storey sheer form reading as a large scale modern office building in the immediate backdrop. Whilst tempered by the material tones that blend with the brickwork of the foreground buildings, the contrast in scale remains evident, having a moderate effect (view #23). The view, however, is subject to change with the current construction of the taller Capital House and Becket House buildings that will significantly alter the wider context, lessening the effect to minor.

152. From Weston Street, the Bermondsey Street building's upper storeys will be evident above the intervening context, sitting above a relatively consistent streetscape (view #28) and similarly from Leathermarket Street when viewed across the public gardens (view #25), although the impact is or in time will be moderated by the appearance of other tall buildings, and as such the effect is minor. The limited harm caused is localised, with the tall building no longer appearing in the view from the north side of Leathermarket Gardens in Kirby Grove (view #26).
153. In terms of other conservation areas, the tall building will occasionally be visible from the Tower Bride Conservation and Tooley Street, albeit it will be seen at a distance and generally within the context of the substantial railway viaducts running into the mainline station (view #13) and wider backdrop of existing and emerging tall buildings within the London Bridge area (view #22). Its impact will therefore be neutral.

*Listed buildings and structures*

154. The area surrounding the application site includes a number of statutory listed buildings and structures, the closest being the Grade II listed railway viaduct opposite the site and the Grade II listed terraces within Bermondsey Street (no.55, nos. 59-63, nos.68-76 and 78, nos.124-130 and 132, nos. 187/189 and 191), and most notably the Grade II\* listed Church of St Mary Magdalen.
155. The closest listed building is the Grade II railway viaduct arches (1846) in Crucifix Lane (Charles Henry Driver, 18464-6), the special interests of which are as part of the history of the rapid expansion of railway infrastructure; its materials and craftsmanship; and its association with the Victorian civil engineer, Charles Henry Driver. The viewer's appreciation of the major railway infrastructure and its significance are unchanged by the proposed tall building opposite.
156. In terms of the listed buildings within Bermondsey Street, Grade II listed no. 55 and nos.59/61 and 63 are nearest, located 25m and 35m to the south and on the opposite side of the street. The former is a late 19<sup>th</sup> century tannery complex, with the 5-storey street building in stock brickwork with decorative stone and red brick details in the Gothic style and featuring a bay of hatch-rank doors. No.59/61 is an early to mid-19<sup>th</sup> century police station (Charles Reeves) over three storeys with basement in stock brickwork with rusticated openings and quoins in a classical style, whilst no.63 is three-storeys with additional attic floor and features a pedimented gable and decorative bas-reliefs. All the buildings have been adapted for offices and shops. Their special interest is derived from their history as part of the mid to late 19<sup>th</sup> century development of Bermondsey Street; their architecture and craftsmanship; but also their group value, forming a short stretch of attractive period buildings of generally similar, finer grain scale.
157. Regarding the development, whilst close by, its main impact is the brickwork facades of the altered no.40 and matching replacement no.42-44, which form the base of the tall building. In immediate views of the listed buildings from within Bermondsey Street or from its junction with Crucifix Lane/St Thomas Street, the

brickwork facades maintain the scale and character of the street, with the lower floors of the tall building above sufficiently set back behind the parapet line not to especially impose on the street or the settings of the listed buildings opposite. The uppermost floors are visible, but are articulated and step away, reducing their appearance. Overall, the impact on the viewer's appreciation of the listed buildings and their settings is minimal, preserving their significance.

158. Further south, on the west side of the street, nos.68 to 76 form an attractive group of five mid-18<sup>th</sup> century houses, adapted for shops with offices above. The terraced houses are varied in style, but share a fine-grained form and modest domestic scale and detailing in a simple classical manner. The 3-storey buildings are stucco with timber shopfronts, with no.68 notable for its partly curved façade and adjacent covered service yard entrance. In addition, no.78 abuts the group, but dates from earlier. The late 17<sup>th</sup> century terraced house is 4-storeys and shares the same fine grain form, stucco finish and timber shopfront, but is notable for its pedimented first floor projecting bay and overhanging top floor, which is finished in blue-painted weatherboard. The Grade II listed houses are rare survivors of the 17<sup>th</sup> and 18<sup>th</sup> centuries and reflective of the development of Bermondsey Street, and enjoy group value as an attractive terrace of period properties.
159. The visual impact of the proposed tall building on the settings of the Grade II listed terraced houses is illustrated in views #18 (Whites Grounds), #19 (Tyer's Gate) and #20 (Black Swan Yard). The verified views show how the brick facades of the tall building's base present onto Bermondsey Street maintain the general scale and character of the streetscape, blending comfortably with the nearby Grade II listed terrace. The upper floors of the tall building, however, are evident in the oblique views, rising above the context and disrupting the historic general roofline. The existing roofline is presently unencumbered in these views, with the parapets seen against sky. The tiered form, warm toned material finishes and planted terraces ease the impact, although the development nonetheless remains prominent. It reads above the terraced houses and the visual impact is dynamic and lessens in views from further south (view #18). Nonetheless, the impact results in some harm to the settings, particularly in close views although this harm would be less than substantial.
160. In terms of the other Grade II listed properties towards the bottom of Bermondsey Street (nos.124-130 and 132, nos. 187/189 and 191), the shift in alignment of the street, distance and intervening context would ensure that any appearance of the proposed tall building would be marginal and the impact negligible on their settings. This would also include the settings of the Grade II\* Church of St Mary Magdalen and its Grade II listed watch house, which are over 400m away from the proposed site. View #14 is a model shot, but illustrates how the tall building would be completely obscured by buildings in the backdrop to the church when viewed from its churchyard.
161. Lastly, view #27 shows the extent to which the tall building would be visible in the backdrop to the Grade II Leathermarket Exchange in Weston Street and neighbouring nos.15-17 Leathermarket Street (George Elkington, 1878). The

view shows that the upper elements of the tall building would be visible to one side of the Grade II listed properties, appearing briefly above the low-rise, TMO building at no.26 on the edge of Leathermarket Gardens. The tall building would read as a minor element, sufficiently remote in the backdrop, with its warm toned material finishes blending with the brickwork of the immediate context. The significance of the listed buildings and their settings would be unaffected.

#### *Other heritage assets*

162. The Vinegar Yard Warehouse and Horseshoe Inn are regarded by the Council as non-designated heritage assets (see policy NSP54 and the conservation area appraisal). The buildings are of local heritage importance, their architectural and historic interest greatly reinforcing the sense of local character and distinctiveness in the area. As NDHAs, the protection or enhancement of the significance of NDHAs, including their settings, is an important material consideration, albeit not as strong as that afforded to statutory designated heritage assets.
163. The proposals to restore the warehouse and bring it back into active use is therefore welcome in terms of preserving the building as a NDHA. As set out earlier, this would involve extensive external repairs to the historic brickwork and roofing; the refurbishment of external features, such as the existing crane and hatch-rank doors or replacement where they are beyond repair; and the reinstatement of missing features, including brick segmental arches, Portland stone cills and hatch rank doors on the north elevation. The windows are replaced throughout, taking the opportunity to unify the designs, using Crittal-style multi-pane framing that closely match the original fenestration, but also to install double-glazed units for enhanced thermal and acoustic performance.
164. Internally, the intention is to similarly restore the building's former appearance, retaining and refurbishing the cast-iron columns and primary beams or matching in suitable replacement elements. The secondary beams and flooring are referenced as being beyond sensible repair, given the extensive problems of water ingress, whilst their replacement allows the opportunity to improve fire safety. The new flooring appears to partly obscure the base of the cast iron columns, presumably to accommodate some services, although the extent of the floor build-up could be improved upon. The final design detail of this element will be secured by condition, to ensure that the extent of any obscuring of the base of the column is minimised and avoided if possible.
165. The part demolition of the south façade to allow the building envelope to open onto the new extension will result in the loss of some original fabric, although much of the elevation was rebuilt and altered following wartime damage. Moreover, the design premise is to locate all ancillary services within the extension, thereby preserving the open character of the warehouse floorplans and supporting its use as high quality offices. As stated earlier, the design for the extension as a distinct building is well conceived and the scale (height and form), positioning and material finishes remain sufficiently sympathetic to the host building. The alterations to the roof to create a rooftop garden are less

sympathetic, but do provide a valued office amenity, and retain the outer pitch and distinctive roof profile in full.

166. Overall, the interventions are considered acceptable and the approach to preserving the warehouse as greatly beneficial, particularly given its NDHA status. It is important that this restoration is carried out to a high standard for the design premise to succeed, and details for the façade repairs, including treatment of the painted signage adjacent to the hatch rank closest to Snowsfields, restored brickwork openings and replacement windows, hatch-ranks and doorways, the extent to which primary and secondary timbers within the building are retained, and the retention of internal pulley and lift mechanisms associated with the hatch ranks will all be required to be confirmed by condition.
167. Regarding the setting of the warehouse, historically it was one of a several similar scaled warehouses that clustered onto Vinegar Yard. This tight, fine-grained urban form has been lost through clearance and wartime bomb damage, with the warehouse left exposed onto St Thomas Street and Snowsfields. The extension will partly improve its setting, infilling the gap onto Snowsfields, whilst Vinegar Yard will be partly re-landscaped to provide an attractive forecourt area to the warehouse.
168. These improvements are set against the impact of the proposed tall building diagonally opposite the warehouse at no 40 and no.42-44 Bermondsey Street. The juxtaposition of scales will be evident, albeit partly eased by the intervening roadway and the retention of no.40 as a contextual brickwork base to the tall building. The NDHA would no longer be seen against a backdrop of buildings of a similar scale and sky. However, its special interest as a surviving warehouse of notable form would remain. Moreover, the new tall building would be one of several tall buildings emerging within the immediate context. Overall, given the changes in its settings over time, on balance, the impact of the new development is neutral.
169. Regarding the Horseshoe Inn, its special interest is partly its decorative, diminutive form and undoubted charm as a surviving, backstreet, traditional public house, but also in its attractive appearance, terminating the view along Melior Street. As referenced earlier, the proposed tall building will sit within the backdrop to this important local vista, appearing overbearing and detracting from the attractive streetscape. Arguably, the presence of the tall building serves to reinforce the pub's diminutive scale and back-street location, and in time, other consented tall buildings will emerge in the foreground, partly impinging on this view. Nonetheless, the vista is its primary setting and part of its special interest, and as such, the impact is of some harm but this would be at the lowest end of less than substantial.

### Landscaping, trees and urban greening

170. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments, Policy G5 requires major development proposals to contribute to the greening of

London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy identifies a scoring system for measuring urban greening on a particular site (Urban Greening Factor) and suggests a target score of 0.3 for predominately commercial development.

171. With regards to trees, London Plan Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
172. At the present time the site comprises mainly buildings, walkways and hard landscaping with a limited number of street trees. Therefore the opportunity exists for significant improvements to be made in terms of soft landscaping proposals and contribution towards urban greening.
173. Whilst it is noted that five trees would be removed to facilitate development, a total of 21 new trees would be provided within an improved landscaped public realm. Supplemented by planting on the roof terraces, the scheme would achieve an Urban greening Factor of 0.36 which exceeds the 0.3 and is welcomed.
174. The scheme includes a number of public realm benefits, most notably the new, characterful pedestrian route that links Bermondsey Street through to Snowsfields; and a sizeable forecourt area onto Vinegar Yard. In addition, the scheme provides short stretches of widened pavement onto Snowsfields. The proposals also include the upgrading of footways and the suggestion of raising the carriageway finish to within 25mm of the kerb along part of Snowsfields. This effectively creates a single surface and the sense of a more generous public realm between the two new buildings, as well as enhancing the connection between the passageway.
175. The landscaping throughout comprises high quality natural stone, including decorative granite setts for the new pedestrian route. It includes the retention of a number of trees, replacement trees and new street trees, including onto Snowsfields and Vinegar Yard, where they will help soften the streetscape. The palette is high quality, although the landscaping details (including tree species) should be conditioned.
176. Lastly, the new landscaping extends to high-level gardens and roof terraces above both buildings that provide welcome greening. The terraced gardens onto Bermondsey Street are notable for being extensive. The planting should bring attractive fringes to the building's parapets, as well as soften the townscape when viewed obliquely along Bermondsey Street. Overall, the landscaping and public realm are high quality and commensurate with the scale of development.

### Design Review Panel

177. The revised scheme was presented to the Council's Design Review Panel (DRP) in January 2022 at the pre-application stage. The panel welcomed the proposals, regarding it as an ambitious scheme that nonetheless responded well to the specific site conditions and the opportunity for a taller building on this site at the edge of the conservation area, where it formed part of the wider narrative of large buildings that cascade in height eastwards from the Shard to Bermondsey Street.
178. It supported the revised design strategy in general, which is considered was clear and worked well with the context. It highlighted the retention and refurbishment of the Vinegar Yard Warehouse without any upward extension as a strong advantage of the new proposals and supported its side extension as a distinct building and the use of the metal cladding, but thought the large roof terrace was too much for the historic warehouse. Regarding the tall building, it felt the elevational architecture of the base needed refining and the entrance to the pedestrian link made more legible. It supported the layered design of the upper floors and whilst it considered the overall massing was not uncomfortable, the panel questioned the proportional relationship between the base and articulated upper form.
179. The panel's concerns have largely been addressed by subsequent revisions to the scheme, with more of the warehouse roof retained; options reviewed for the elevational detailing of the tall building's base; the articulation of the upper floors further developed; and the high quality of material finishes embedded within the designs.

### Designing out crime

180. Policy D3 of the London Plan 2021 states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places. Policy P16 of the Southwark Plan 2022 reinforces this and states that development must provide clear and uniform signage that helps people move around and effective street lighting to illuminate the public realm. These issues are important consideration and the development would be required to achieve Secure By Design Accreditation. This would be a conditioned requirement of any consent issued, as recommended by the Metropolitan Police.

### Fire safety

181. A Fire Statement (dated July 2022) has been submitted to demonstrate compliance with the requirements of London Plan Policy D12. This policy requires developments to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for appliances, incorporate features to reduce risk to life and injury in the event of a fire; designed and constructed in order to minimise the spread of a fire; and provide suitable and convenient means of escape for all building users.
182. The policy requires that the Fire Statement should include information in terms of the building's construction, means of escape for all users, fire suppression



features and measures that would reduce risk to life and injury. The strategy should also include details of how access would be provided for fire service personnel and equipment as well as provision for appliances to gain access to the building.

183. The submitted Fire Statement has been prepared in accordance with Policy D12 of the London Plan. The Fire Statement confirms that a sprinkler system will be used within the Bermondsey Street building and that this building will feature a phased evacuation strategy using firefighting lifts for the evacuation of the mobility impaired in the first phase and the use of two protected stair cores. The compartmentation fire resistance time for the Bermondsey Street building would be 120 minutes.
184. In the Vinegar yard Warehouse there would be a simultaneous evacuation strategy and occupants can use the firefighting lift to evacuate prior to the arrival of the Fire Brigade. The compartmentation fire resistance time for the Vinegar Yard Warehouse would be 90 minutes.
185. The Fire Statement also confirms that the buildings would be served by a fire detection and alarm system. The strategy also provides information on emergency power supplies, means of escape, smoke ventilation systems, firefighting lobbies, access for Fire Brigade and the competency of the strategy authors.
186. The GLA have requested additional information on the building's construction methods and rating of products and materials used, and the management of future alterations to the building as well as clarity on the evacuation of the mobility impaired and the combination of firefighting/evacuation lifts. These issues are being discussed between the applicant and the GLA and will be resolved prior to Stage II referral.

187.

### **Archaeology**

188. Whilst the scheme has been significantly revised in terms of its above ground scale, massing and detailed design, the overall footprint of the buildings is similar to the original scheme and the formation level of the basements currently proposed would be higher than the original scheme. As such, it is concluded that any below ground excavations are likely to result in archaeological effects occurring that are equivalent in nature and scale to those reported in the 2019 ES, and a detailed reassessment of archaeological effects is not required.
189. The site lies at an exceptionally interesting location within the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone (APZ) and is extremely sensitive for archaeological matters. When the New Southwark Plan is adopted the site will lie within the newly extended 'North Southwark and Roman Roads ' Archaeological Priority Area (APA). Policy 23 of the Southwark Plan 2022 requires that proposals for development in APZ/As should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report (the results of digging archaeological trial trenches).
190. The site has been managed as two separate parcels of land with respect to archaeology, each having a different archaeological consultant and a different

team of archaeologists. The applicant has submitted separate desk based assessments, written schemes of investigation (WSIs) and pre-determination archaeological evaluation reports for each of the two site areas. Effects on the historic built environment have also been quantified in the ES Volume 2. The two project teams for the two sites have been in close consultation with Southwark's Archaeology Officer and each other. The larger Vinegar Yard and St Thomas Street site was managed by MillsWhipp Projects and the archaeological team were Pre-Construct Archaeology (PCA); they have submitted a Written Scheme of Investigation (WSI) by MillsWhipp Projects dated Oct 2018 and a Summary Report of the Evaluation Works at Vinegar Yard and St Thomas Street by PCA dated Nov 2018. At the 40 Bermondsey Street, 42-44 Bermondsey Street and 1-7 Snowfields the site was managed by ARUP and the archaeological team were Museum of London Archaeology (MoLA); they have submitted a WSI by MoLA, dated 9th November 2011 and a pre-determination evaluation report (including a Geoarchaeological Deposit Model report) by MoLA and dated January 2019.

191. As pre-determination evaluation has taken place on each parcel of land there is now sufficient information to make a planning assessment and determine whether this development is likely to cause harm to the buried historic environment and, if so, what measures need to be in place to manage this. Whilst the ES has categorised the impact of the development on buried heritage as slight adverse, it should be noted that following a programme of archaeological recording, the impact on buried archaeological remains would be minimised and less than significant.
192. The archaeological potential of the general area is evidently high, particularly with regard to medieval and post-medieval settlement and water management regimes - as well as the potential for prehistoric deposits, structures and finds. The sites have high potential for paleo-environmental remains and deposits dated from the earliest times. It is also possible that Roman deposits may survive within the alluvial sequence at depth. Links to the historic route of Bermondsey Street and nearby Bermondsey Abbey may also be present. The 16th century mansion of Henry Goodyere, a rich merchant, may have been partially discovered on the Vinegar Yard site. Subsequently, the area became a centre for post-medieval industries and warehouses, particularly relating to the tanning industry - with extensive archaeological remains surviving.
193. The application scheme includes basements and if this were consented the applicant must be mindful that all archaeological remains within the area of impact (as these cannot be preserved in situ through sympathetic design options) must be fully excavated.
194. There is now sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission on the grounds of archaeological interest provided that robust archaeological conditions are applied to any grant of consent. So, if the application scheme gains consent the applicant must be mindful that for any archaeological remains that are encountered - if these cannot be preserved in situ under a foundation design condition - they must be prepared to pay for and manage the excavation of these remains entirely and/or potentially lift and preserve off-site or in the new development any previously unknown but important remains. Other requirements will also be to carry out full archaeological post-excavation

mitigation, publication and deposition of the archaeological archive. Historic buildings on the sites should also be recorded to Historic England Level 3 standard.

195. In accordance with best practice as set out in current policy and guidance the applicant should consider opportunities for an appropriate programme of public engagement, for example: Historic England's 2015 publication 'Guidelines for Archaeological Projects in Greater London' provides advice on popular interpretation and presentation options. This can be provided for within the S106 Agreement.

### **Impact of proposed development on amenity of adjoining occupiers and surrounding area**

196. The importance of protecting neighbouring amenity is set out Southwark Plan Policy P56 which states "Development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users". The adopted 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
197. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The 2019 ES and Addendum ES deal with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

### Outlook and privacy

198. In order to prevent harmful overlooking, the Residential Design Standards SPD requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. This distance is met between the Snowfields building and the adjacent residential building across Snowfields known as Raquel Court. The residential properties at 8-20 Snowfields are not directly opposite the Snowfields building or the extension, which would not have any directly opposing windows that would offer direct views into windows at 8-20 Snowfields.
199. As with the originally submitted scheme, these distances are not met on Bermondsey Street when considering the Bermondsey Street buildings and their relationship with the buildings on the east side of Bermondsey Street. This is as a result of retaining 40 Bermondsey Street and retaining the building line at 42-44 Bermondsey Street which is a character of the conservation area and would not result in any new viewpoints. Overall, the development is not considered to give rise to any unacceptable effects on amenity as a result of overlooking.
200. Both the Bermondsey Street building and the Vinegar Yard Warehouse incorporate terrace amenity spaces for the office occupiers. In order to safeguard amenity for adjacent residents it is recommended that a condition be imposed

restricting the hours of use of the terraces.

## Daylight

201. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
202. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings.
203. This area south of St Thomas Street and the redeveloped London Bridge Station has been identified as an area where tall buildings are appropriate and there are existing tall buildings in the area such as the Shard and Guys Hospital Tower as well as consented schemes at Capital House and Becket House which are within close proximity to the site. A tall building has a resolution for consent by the GLA and is currently in the final stages of S106 Agreement negotiation.
204. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows;

Reduction in VSC	Level of impact
0-20%	Negligible
20.1-30%	Minor
30.1-40%	Moderate
40% +	Major

205. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.
206. Whilst considered as part of the 2019 ES, a detailed re-assessment of the daylight, sunlight and overshadowing effects of the revised proposals is required on the basis that the changes in the size and design of the development are capable of changing the magnitude and consequent significance of those effects. The reassessment is set out in full in the Addendum ES and it should be noted that the baseline has been updated to take into account the consented and under construction Capital House development.
207. The ES considers the impact on the following neighbouring buildings:

- Bermondsey Village Hall
- 26 Melior Street, Horseshoe Pub
- 8-20 Snowsfields
- The Glasshouse, 2 Melior Place
- 4-31 Melior Street
- Globe House, 2a Crucifix Lane
- 147 Snowsfields, Raquel Court
- Hardwidge Street
- Snowsfields Primary School
- 1-114 Guinness Court
- 145-147 Guinness Court
- 115-144 Guinness Court
- 80 Weston Street
- 72 Weston Street
- 70 Weston Street
- 123 Snowsfields, The Rose Ph
- Nelson Recreation Ground, Guy Street, 115-122 Snowsfields
- 62-66 Weston Street, 38-43 Snowsfields
- Land Adjoining, 14 Melior Street
- Our Lady Of La Salette Church & Adjoining 14 Melior Street
- 52-54 Weston Street
- 48-50 Weston Street
- Wolfson House, 49 Weston Street
- 7-25 Bermondsey Street
- Land and buildings at Holyrood Street and Magdalen Street
- 2 Crucifix Lane
- 4 Crucifix Lane
- 6 Crucifix Lane
- 10-14 Crucifix Lane
- 16 Crucifix Lane
- 60-66 Whites Grounds Estate
- 67-91 Whites Grounds Estate
- 23-59 Whites Grounds Estate
- 1-22 Whites Grounds Estate
- 99-118 Whites Grounds Estate
- 79-83 Bermondsey Street
- 60 Bermondsey Street
- Tyers Estate
- 68-70 Bermondsey Street
- 72 Bermondsey Street
- 2 Carmarthen Place
- 4 Carmarthen Place
- Land to Rear Of 72-76 Bermondsey Street
- 74 Bermondsey Street
- 76 Bermondsey Street
- 78 Bermondsey Street
- 80 Bermondsey Street
- Part of 82-84 Bermondsey Street, 2 Tyers Gate
- 4-6 Tyers Gate
- 8 Tyers Gate
- 1 Tyers Gate

208. The daylight report has considered a large number of windows and rooms around the site. It assessed 2,388 windows serving 1,570 rooms across 51 properties for daylight amenity. Of the 2,388 windows assessed 2,318 (97%) would satisfy the BRE recommended levels for VSC. Of the 1,570 rooms assessed, 1,567 (98.4%) would meet the BRE standards for NSL. The following buildings would experience a negligible daylight impact as a result of the proposed development and as such are not considered further in this assessment.

- Bermondsey Village Hall
- 26 Melior Street, Horseshoe Pub
- The Glasshouse, 2 Melior Place
- 4-31 Melior Street
- 16 Hardwidge Street
- 1-114 Guinness Court
- 145-147 Guinness Court
- 115-144 Guinness Court
- 80 Weston Street
- 72 Weston Street
- 70 Weston Street
- 123 Snowsfields, The Rose Ph
- Nelson Recreation Ground, Guy Street, 115-122 Snowsfields
- 62-66 Weston Street, 38-43 Snowsfields
- Land Adjoining, 14 Melior Street
- Our Lady Of La Salette Church & Adjoining 14 Melior Street
- 52-54 Weston Street
- 48-50 Weston Street
- Wolfson House, 49 Weston Street
- 7-25 Bermondsey Street
- Land and buildings at Holyrood Street and Magdalen Street
- 2 Crucifix Lane
- 4 Crucifix Lane
- 6 Crucifix Lane
- 10-14 Crucifix Lane
- 16 Crucifix Lane
- 60-66 Whites Grounds Estate
- 67-91 Whites Grounds Estate
- 23-59 Whites Grounds Estate
- 1-22 Whites Grounds Estate
- 99-118 Whites Grounds Estate
- 79-83 Bermondsey Street
- 60 Bermondsey Street
- 68-70 Bermondsey Street
- 72 Bermondsey Street
- 4 Carmarthen Place
- Land to Rear Of 72-76 Bermondsey Street
- 74 Bermondsey Street
- 76 Bermondsey Street
- 78 Bermondsey Street
- 80 Bermondsey Street
- Part of 82-84 Bermondsey Street, 2 Tyers Gate
- 4-6 Tyers Gate
- 8 Tyers Gate

- 1 Tyers Gate

209. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is detailed below;

Table – Existing V. Proposed VSC

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of between 20%-29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
8-20 Snowsfields	74	70	1	0	3
Globe House, 2A Crucifix lane	38	19	0	5	14
147 Snowsfields, Raquel Court	56	44	12	0	0
Snowsfields Primary School	96	94	0	1	1
Tyers Estate	168	137	17	0	14
2 Carmarthen Place	16	14	2	0	0

Table – Existing V Proposed NSL

Property	No. of rooms tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of between 20%-29.9% reduction in NSL	No. with moderate adverse impact of between 30%-39.9% reduction in NSL	No. with major adverse impact of over 40% reduction in NSL
8-20 Snowsfields	63	60	0	0	3
Globe House, 2A Crucifix lane	13	9	1	0	3
147 Snowsfields, Raquel Court	30	30	0	0	0
Snowsfields Primary School	60	60	0	0	0
Tyers Estate	134	115	11	5	3
2 Carmarthen Place	6	6	0	0	0

*8-20 Snowsfields*

210. A total of 74 windows serving 63 rooms have been assessed for VSC and NSL at this property. A total of 70 of the 74 windows would remain compliant for VSC whilst 60 of the 63 rooms would remain compliant for NSL. The four rooms that



would experience losses of VSC one would experience a loss of 29.2% which would be categorised as a minor effect in the ES. Additionally, it should be noted that the room this window serves would remain compliant for NSL. The windows serving the three remaining rooms would all experience major adverse (significant) changes in VSC with losses of between 62.70% and 65.03%. The rooms served by these windows would also experience major adverse (significant) changes in NSL. However, these rooms do not appear to be principal living accommodation and as such the reductions would not have significant amenity impacts. The effect on this property is considered to be moderate adverse and the impact is considered acceptable.

*Globe House, 2A Crucifix Lane*

211. A total of 38 windows serving 13 rooms have been assessed for VSC and NSL at this property. Of the 38 windows assessed for VSC, 19 would remain compliant with the BRE, five would experience moderate loss of VSC of between 30-39.9% and 14 would experience major loss of VSC in excess of 40%.
212. The five windows experiencing moderate losses of VSC all serve rooms that benefit from several other unaffected windows. The 14 windows that would experience major loss of VSC in excess of 40% all appear to serve bedrooms based on information available on the planning register. The BRE recognises bedrooms as being less sensitive to daylight changes. Additionally, it should be noted that nine of these windows would retain at least 15% VSC.
213. Of the four rooms experiencing noticeable losses of NSL, one room would experience a minor loss of 21.3% whilst the remaining three rooms would experience loss of between 51.7%-55.6% NSL. In all four cases the room type appears to be a bedroom which as set out above, are less sensitive to daylight changes than principal living accommodation. Overall the effect on this property is considered to be moderate adverse and the impact is considered acceptable given the room use and the mitigating circumstances around unaffected windows serving the same rooms.

*147 Snowfields/Raquel Court*

214. All 30 rooms assessed for NSL at this property would remain fully compliant with the BRE. Of the 56 windows tested for VSC, 44 would remain compliant with the BRE and the remaining 12 would see minor effects as a result of VSC losses of between 20.78% and 27.38% however in all cases, windows would retain at least 20% VSC which is a comparable level of VSC for an urban location. The effect on this property is therefore minor.

*Snowfields Primary School*

215. All 60 rooms assessed for NSL at Snowfields Primary School would remain fully compliant with the BRE. Of the 96 windows tested for VSC, 94 would remain compliant with the remaining two windows experiencing a moderate (30-39.9% reduction) and major reduction (in excess of 40%). These windows have very low baseline VSC values and so the small 0.32% and 2.03% actual VSC changes to these windows present themselves disproportionately in percentage terms. It should also be noted that these two windows serve a room that benefits from two

additional windows that would remain BRE compliant in terms of VSC and the room would remain BRE compliant in terms of NSL. The effect on this property is therefore considered to be minor.

### *Tyers Estate*

216. A total of 168 windows across these buildings have been assessed for VSC and 137 would remain fully compliant. Minor reductions of between 20.61% and 28.49% would be experienced at 17 windows. The remaining 14 windows would see major reductions in VSC of between 47.06% and 79.22%. However, these windows have low baseline VSC levels and the actual real terms loss of VSC ranges from 1.2% to 4.44%
217. NSL was assessed at 134 rooms and 155 would remain compliant. Of the remaining 19 rooms, 11 would see minor reductions, five would see moderate reductions and three would see major reductions. Taken together with the VSC results, the overall effect on the Tyers Estate is moderate adverse.

### *2 Carmarthen Place*

218. All six rooms assessed for NSL at this property remain BRE compliant. Of the 16 windows assessed for VSC, 14 windows would remain BRE compliant whilst two windows would see minor reductions of 21.29 and 25.91%. The effect on this property is considered to be minor.

### Cumulative daylight impacts

219. The applicant has considered cumulative daylight impacts in the Addendum ES taking into account a future baseline that includes nearby consented schemes and this is presented in Appendix G of the Addendum ES. As before, the daylight assessment considered windows and rooms within the vicinity of the site with the daylight impacts summarised below:

Property	Significance of Cumulative Effect
8-20 Snowfields	Moderate adverse
4-31 Melior Street	Minor adverse
Globe House, 2A Crucifix Lane	Moderate adverse
147 Snowfields	Minor adverse
Snowfields Primary School	Minor adverse
Tyers Estate	Moderate adverse

220. With the exception of 4-31 Melior Street, the cumulative effect on the remaining properties would be in the same category as the existing versus proposed scenario. 4-31 Melior Street would experience negligible effects under the existing versus proposed scenario but moves to a minor adverse effect under the cumulative scenario.
221. A total of 70 rooms were assessed for NSL at 4-31 Melior Street under the cumulative scenario and all 70 rooms would remain BRE compliant. In terms of VSC, 148 windows were assessed and 139 would remain BRE compliant. Of the remaining nine windows, eight would see minor VSC reductions of between 20%-29.9% loss and one window would see a moderate VSC reduction of between

30%-39.9%. In all cases the affected windows serve rooms that benefit from other windows that would remain BRE compliant in terms of VSC.

### Sunlight

- 222. All of the windows within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states that if a window can receive 25% of summer sunlight, including at least 5% of winter sunlight between the hours of 21 September and 21 March, then the room would be adequately sunlight.
- 223. In terms of sunlight, 737 residential (or similar use) across 43 properties have been assessed for sunlight amenity both in terms of total Annual Probable Sunlight Hours (APSH) and Winter APSH.
- 224. Of the 737 rooms that have been assessed for sunlight, 732 would remain BRE compliant (99.3%). The remaining 5 windows would experience some sunlight reductions. All of these windows are located at Globe House, 2A Crucifix Lane.
- 225. Five out of the 10 rooms assessed for sunlight amenity at this property would remain compliant with the BRE. The remaining five rooms would experience reductions in both winter and annual sunlight. Four of these rooms are bedrooms and would retain absolute levels of winter sunlight of between 7% and 9% against the BRE recommended target of 5%, and absolute levels of annual sunlight of between 21% and 23% against a BRE recommended target of 25%. The remaining room is a living room which would retain an absolute level of winter sunlight of 4% against the BRE recommended target of 5%, and an absolute level of annual sunlight of 24% against a BRE recommended target of 25%.
- 226. The retained sunlight levels are acceptable given the urbanized location and the fact that the divergence from the target levels is minor. Overall the effect on this property is considered to minor.

### Cumulative sunlight impacts

- 227. Under the cumulative scenario, 752 residential (or similar use) across 44 properties have been assessed for sunlight amenity both in terms of total Annual Probable Sunlight Hours (APSH) and Winter APSH. Of the 752 rooms that have been assessed for sunlight, 747 would remain BRE compliant (99.3%). The remaining 5 windows would experience some sunlight reductions. All of these windows are located at Globe House, 2A Crucifix Lane. The impacts would be the same as set out previously for this property and would be considered minor.

### Overshadowing of amenity spaces

- 228. The Addendum ES has also considered overshadowing of amenity spaces as a result of the revised proposals. Amenity spaces at The Horseshoe Inn and the pocket park on Melior Street/Fenning Street have been considered. The results are presented in the table below:

Amenity Space	Baseline (% of area)	Proposed (% of area)	% change between	Scale of Effect as categorised
---------------	-------------------------	-------------------------	---------------------	-----------------------------------

	receiving two hours of sun on the 21 <sup>st</sup> March)	receiving two hours of sun on the 21 <sup>st</sup> March)	Baseline condition and completed development	by the ES
Horseshoe Inn Garden	41.6%	36.5%	12.3%	Negligible
Pocket Park Melior Street/Fenning Street	57.6%	56.6%	1.7%	Negligible.

229. The reductions are within the scope of the BRE which recommends a maximum reduction of 20%. In both cases the results are an improvement on the original scheme.
230. Overshadowing of amenity spaces has also been considered in the cumulative scenario. This considers the Horseshoe Inn as before as well as the amenity spaces proposed/consented at Vinegar Yard and Becket House.

Amenity Space	Baseline (% of area receiving two hours of sun on the 21 <sup>st</sup> March)	Proposed (% of area receiving two hours of sun on the 21 <sup>st</sup> March)	% change between Baseline condition and completed development	Scale of Effect as categorised by the ES
Horseshoe Inn Garden	40.3%	36.1%	10.4%	Negligible
Vinegar Yard	57.6%	29.7%	69.2%	Moderate.
Becket House	27.8%	27.1%	2.5%	Negligible.

231. The sun on ground assessment for the amenity spaces of the Vinegar Yard development shows a reduction of area achieving at least two hours of sunshine on 21 March from 96.4% to 29.7%. This represents a reduction of 69.2% against a recommended maximum of 20%. This level of sun on ground reduction on 21 March suggests that the cumulative overshadowing effect of the revised proposals to this area is major adverse.
232. By the 21 June however, the sun on ground assessment results demonstrate that during the summer months, when this area is most likely to be used for sitting out, the whole area (100%) will be able to benefit from at least two hours of sun on the ground. The overall cumulative overshadowing effect to this area is, therefore, considered to be no greater than moderate.

### Light pollution

233. The 2019 ES and the updated Addendum ES demonstrate pre and post curfew effects would be negligible or minor with the exception of the first to third floor of residential properties at 1-12 Tyers Estate whereby there could be light pollution that would be categorised as moderate in effect. The applicant is proposing mitigation for post curfew period in the form of a building management system that would have control of integrated blackout blinds. Officers consider that this mitigation could be employed on the lower levels of the building adjacent to 1-12 Tyers Estate at an earlier hour than the curfew in order to mitigate the potential

impacts in terms of light pollution. The relevant condition would be imposed on any consent issued.

### Conclusion on daylight and sunlight

234. The daylight and sunlight assessment presented as part of the ES demonstrates that there would be several windows that would see noticeable losses of VSC and rooms that would see noticeable losses of NSL beyond the BRE guidelines.
235. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.
236. The results of the daylight assessment demonstrate that there would be a limited impact on daylight and sunlight to surrounding properties as a result of the proposed development. The overall BRE compliance rate for VSC and NSL would be 97% and 98.4% respectively. In terms of sunlight, there would be a compliance rate of 99.3% which is positive. Whilst adverse daylight impacts have been identified at some properties they are not considered to be significantly adverse, would generally not impact upon principle living accommodation and would not detrimentally harm residential amenity or room functionality.
237. Given the small number of windows overall that would experience significant effects and the site specific circumstances set out above including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed development in redeveloping a currently under-used site, the provision of a significant new public realm, offices, retail, significant employment opportunities and the full refurbishment and meaningful re-use of the Vinegar Yard Warehouse. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.

### Solar glare

238. Solar glare has been considered as part of the 2019 ES and the Addendum ES. Various car/train driving viewpoints have been considered. The viewpoints set out below are considered to experience a minor solar glare effect and as such are considered acceptable.
1. Junction of Crucifix lane, St Thomas Street, Bermondsey Street and Snowsfields;
  2. Junction of Hardwidge Street with Snowsfields;
  3. Junction of Kirby Grove with Snowsfields and Melior Place;
  4. Junction of Guinness Court with Snowsfields;
  6. Raised Viaduct train track
239. In terms of the remaining viewpoint, viewpoint 5 travelling east on Melior Street,

the impact would also be limited to minor adverse as the potential for glare is limited to between five and ten minutes at 4pm each day in late January/early February and at 4:30pm in late October/early November. Additionally the potential for glare to occur is relatively high up on the building and would not impair the driver's vision of traffic signals or pedestrian crossings.

## **Transport and highways**

240. Chapter 9 of the NPPF seeks to ensure that transport issues are properly addressed as part of development proposals. Proposals must assess the impact upon existing transport networks, promote and maximise opportunities for sustainable transport modes whilst mitigating any adverse transport related environmental effects and must make a significant contribution to improving accessible movement and permeability as a key priority for place making. Paragraph 111 states "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".
241. This approach is reflected in Chapter 10 of the London Plan and Southwark Plan Policies P49 – P55, which require development proposals to maximise sustainable modes of transport by minimising car journeys, to deliver enhanced walking and cycling opportunities and safe, accessible routes to public transport. Developments should be car free save for disabled parking provision and mitigation will be secured where necessary to address impacts upon the road and public transport networks to serve new developments
242. This application was accompanied by a Transport Assessment. The documents have been reviewed by the Council's Transport Policy and Highways Teams, and Transport for London (TfL).

### Site context

243. The application site boundaries are marked by St Thomas Street to the north; Bermondsey Street to the east; and Snowfields which divides the site into east and west sectors. St Thomas Street forms part of the Transport for London Road Network (TLRN).
244. London Bridge Station is the nearest train and underground station to the site, located approximately 200m to the west along St Thomas Street. Various buses run along nearby roads including Tooley Street, Crucifix lane, St Thomas Street and Borough High Street. Given the multiple public transport options available in close proximity to the site the PTAL rating is 6B, indicating an excellent level of provision. In addition to public transport, the site is served by the cycle hire scheme with docking stations located on Snowfields, Potters Fields Road and Tanner Street
245. The site is well located for cycling with Cycle Superhighway 3 and 7 located close by at Monument and Southwark Bridge Road respectively. A new Cycle Superhighway between Tower Bridge and Greenwich is expected to run close to the site and there are hopes that this could be extended westwards to London Bridge Station along Tooley Street.

## Site layout

246. The site has a simple and rational layout that is delineated by the existing streets and pavements. The Bermondsey Street building retains the existing building line and provides a new pedestrian route linking Bermondsey Street with Snowfields. A loading bay is provided off-street within the Bermondsey Street building and this is accessed from Snowfields. This would provide off-street servicing for the Bermondsey Street building.

Image – connectivity and integration



247. The Vinegar Yard Warehouse (retained) would be supplemented by a new extension that would have a frontage onto Snowfields. Servicing and deliveries for the Vinegar Yard building will take place from a proposed loading bay to the north west of the site, which would be accessed from Snowfields.

## Trip generation

248. The Council's Transport Officer has undertaken an independent review of trip generation for the site using the TRICS database. The use of TRICS is supported by TfL. The Transport Officer, using TRICS, has demonstrated that the development would produce approximately six and eight two-way net additional vehicle movements in the morning and evening peak hours respectively. This level of trip generation would not have any noticeable impact on the transport network.
249. In terms of impacts on public transport, the applicant's consultants have also forecasted that this proposed development would produce around 508 two-way public transport trips in the morning or evening peak hours and 37 two-way delivery vehicle movements per day, figures which are deemed reasonable. Contributions towards public transport improvements are sought. A Travel Plan would be secured as part of the S106 agreement.

## Servicing and deliveries

250. The delivery and servicing burden of the proposed building is low. It is proposed that the Vinegar Yard Warehouse be serviced from the on-street bay to the north west of the site in line with local restrictions. Given the size of the Vinegar Yard Warehouse and the lower servicing needs of this building, this approach is considered appropriate.
251. The Bermondsey Street building would be serviced off-street via an eight metre



loading bay that would be accessed from Snowfields and would align with the proposal on the original scheme. The proposed servicing arrangements for both buildings are considered acceptable and would minimise impacts on the highway.

### Refuse storage arrangements

252. Refuse would be stored within dedicated bin stores within the basement level of each building. On waste collection days, the Facilities Management team will transport the bins from the basement waste store in the Bermondsey Street building to the collection point in the loading bay via the goods lifts. For the Bermondsey Street building, waste collection vehicles will be able to use the loading bay within the service yard to access the waste collection area. With regards to the Vinegar Yard Warehouse, on waste collection days, the facilities management team will transport the bins from the basement waste store to ground floor level via the goods lift. The facilities management team will rotate the bins as they are collected from the basement waste store to the collection vehicle to ensure that waste bins are not left on the street. This would be secured by condition.

### Healthy Streets

253. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. The development provides the opportunity to greatly improve the pedestrian environment, improving the street level experience, improving pedestrian connectivity and legibility, promoting sustainable forms of transport and the use of public transport modes and the provision of a new pedestrian route and improved pavements.
254. This development would be car free save for a single accessible car parking space thus promoting walking, cycling and use of public transport. Contributions have been secured for sustainable transport modes to accommodate the demand created by future occupiers of the site. Public realm improvements have been integral to the design of the scheme and new pedestrian routes linking Bermondsey Street and Snowfields would be provided. The development seeks to significantly enhance biodiversity through the new landscaped public space next to the Vinegar Yard Warehouse which, together with the future Vinegar Yard development, will offer opportunities to improve local biodiversity. on Duke Street Hill and seeks to improve air quality. The scheme has been designed to minimise air pollution as much as possible and would be air quality neutral.

### Car parking

255. London Plan Policy T6 seeks to encourage car free and car limited development as much as possible and sets maximum car parking standards for different uses whilst recognising the need for an appropriate provision of disabled parking and adequate arrangements for servicing. Non-residential uses should provide a minimum of one disabled space. All car parking spaces must be fitted with electric vehicle charging points. Southwark Plan Policies P54 and P55 set out

car parking standards for various land uses and echo the requirements of the London Plan in terms of setting maximum car parking standards and promoting car free development save for minimum disabled provision.

256. The development is proposed to be 'car free' with the exception of one accessible car parking space which must be equipped with electric vehicle charging facilities. This provision is in line with development plan policies and should be secured by conditions.

### Cycle parking and cycling facilities

257. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out a higher requirement than the London Plan standards.

Image – Cycle parking and loading bay (Bermondsey Street building)



258. Under Southwark Plan policy, the development would be required to provide 352 long stay spaces and 67 short stay spaces. The revised proposals would provide 364 long stay spaces and 71 short stay spaces, thereby exceeding the minimum policy requirement of the Southwark Plan. This is welcomed and a condition would be imposed on any consent issued to finalise the details of the cycle parking in order to ensure provision of spaces for cargo bikes and to secure details of cycle facilities such as showers, changing rooms and repair spaces.

259. In line with comments from TfL, a financial contribution of £100,000 should be secured in order to provide funding to expand cycle hire facilities in the area by approximately 15 spaces. Provision will be made for this in the S106 agreement.

## **Environmental matters**

### Ecology

260. The applicant submitted a Preliminary Ecological Appraisal with the originally submitted scheme and this has been supplemented by an additional Bat Survey

Report for the revised proposals. The Council's Ecologist has been consulted on both documents and both sets of plans and has concluded that they are suitable for assessing the impact of the development on local ecology. The report concludes that there would be no adverse ecological impacts and in order to provide ecological enhancement the Council's Ecologist has recommended conditions relating to the provision of biodiverse roofs and the installation of Swift bricks. The relevant conditions would be attached to any consent issued.

### Water resources and flood risk

261. The water resources subject area was considered as part of the 2019 ES and the applicant submitted a Flood Risk Assessment (FRA) and a Drainage Strategy in support of the application. No significant effects were identified as part of the 2019 ES. The site is located within Flood Zone 3 which is considered to be an area of high risk of flooding due to the proximity of the tidal River Thames. However the site is protected by the Thames Barrier and related defences. The proposed development does not include any residential accommodation and all of the proposed uses are classified as "less vulnerable" and as such are acceptable within Flood Zone 3a. The Environment Agency were consulted on both the original proposal and the revised proposal and have raised no objections to either.
262. The Addendum ES has considered the need to re-assess water resources due to the proposed changes to the design and scale of the development and how it would interact with flood risk and drainage.
263. The Addendum ES has assessed construction effects, existence effects and operational effects on water resources. Beginning with construction effects, the Addendum ES considered the following:
- Surface water flood risk due to temporary changes to the water network;
  - Surface water runoff volume and quality; and
  - Ground water.
264. No significant effects have been identified and no additional mitigation is proposed or warranted. In terms of existence effects, the Addendum ES has considered the following:
- Surface water flood risk and drainage
  - Groundwater
265. Whilst no significant effects have been identified and no additional mitigation is proposed or warranted, it should be noted that there is the potential for a major beneficial residual effect. This results from the fact that the surface water drainage strategy would ensure that peak flows from the revised proposal rates are 3l/s. With the Bermondsey Street site providing a 94% betterment on existing conditions and the Vinegar Yard Warehouse site an 89% betterment for the 1 in 100 year + 40% climate change event. This would result in a negligible impact on surface water flood risk and a major beneficial effect on surface water drainage.
266. Foul water drainage and potable water supply were assessed for operational

effects on water resources and no significant effects were identified. It should also be noted that no cumulative effects have been identified.

### Sustainable urban drainage

267. The applicant has developed a SUDS strategy for the site that incorporates the use of eight separate blue roof systems across the terraces of the Bermondsey Street building at levels four, six, eight, ten and 11, as well as roof level. This would be a 94% betterment on existing runoff rates. On the Vinegar Warehouse site, rainwater will be attenuated by a blue/green roof located on the terrace at Level four with the remaining area being attenuated through a combination of permeable paving and soft landscaping. This would be an 89% betterment in comparison to existing surface water runoff rates.

### Land contamination

268. Ground conditions were assessed as part of the original 2019 ES. Whilst the revised scheme is different to the originally submitted scheme in terms of above ground works, the footprint is similar and the formation level of the proposed basements is at a higher level than that previously proposed. As such, below ground excavations are likely to result in effects as reported in the 2019 ES, and a detailed reassessment of ground conditions and contamination effects is not required as a result of the revised scheme.

269. The 2019 ES considered ground conditions through the following:

- A desk-based detailed review to identify potential sources of contamination on or surrounding the site;
- Assessment of the potential for contamination based on the baseline conditions
- A risk-based ground contamination assessment considering potential sources, receptors and pollutant linkages in line with Government guidance;
- Consideration of mitigation measures to address any adverse impacts.

270. The ES concludes that there would be no significant effects however it does note that there may be significant effects if asbestos is found in the soil. This would be identified early in the development programme through soil contamination studies and appropriate remediation would need to be put in place should asbestos be found. The Council's Environmental Protection Team previously reviewed the information and considered it acceptable subject to standard conditions around land contamination, soil sampling and remediation measures that will ensure there would be no adverse impacts resulting from the proposed development in terms of ground conditions.

### Air quality

271. Air quality was assessed as part of the 2019 ES and it is concluded that no detailed re-assessment of air quality is required as part of the revised proposals as there would be no material change. The scope of the 2019 ES air quality assessment was based on construction traffic and combustion sources. The

proposed development is significantly reduced in quantum from the originally submitted scheme and as such the construction related traffic would either be equal to or lower than the previous proposal. As such the results and conclusions of the 2019 ES remain valid in terms of air quality.

272. The 2019 ES concluded that during the demolition and construction phase, it is recognised that there would be impacts such as dust in the air as well as dust and dirt on the highway as a result of construction vehicle movements. This can be suitably managed and mitigated through a Construction Environmental Management Plan which would be a conditioned requirement of any consent issued. The impact of construction vehicle traffic emissions is not considered to be significant.
273. An Air Quality Neutral Assessment was prepared for the 2019 ES and this has been updated to take into account the revised proposals and the result shows that the revised proposals have been determined to be air quality neutral. A sensitivity test has been undertaken for the air quality neutral assessment based on the latest consultation draft guidance. For building emissions, the proposal only includes a backup generator to be used in emergencies and has been excluded from the emissions calculator in line with guidance. As such, building emissions for the revised scheme do not need to be reviewed further as the emergency generator would be the only source of combustibles on site. Transport emissions have also been determined to be air quality neutral following the latest consultation draft guidance.

## Wind

274. Wind and microclimate impacts have been fully assessed as part of the 2019 ES. This assessment included taking readings of predicted wind levels at various points around the site and the surrounding area and considering if the climatic conditions would be suitable for the predicted use, utilising wind tunnel testing.
275. The ES addendum considers the need for wind and microclimate to be reassessed and it is concluded that a desk based reassessment is appropriate given the scheme changes in terms of articulation, massing and height. The addendum notes the elements of the revised proposal that are relevant to the reassessment as being:
- Building 1 (Bermondsey Street), comprises 11 storeys above ground and extends to a maximum height of 47.5m above ground level. The massing articulation includes steps at levels 4, 6, 8 and 11 on the northern and north-eastern facades. The maximum height of Building 1 has been marginally increased as compared to the originally submitted scheme of four to nine storeys above ground (21.3m to 42.1m above ground level).
  - Building 2 (Vinegar Yard Warehouse) comprises 5 storeys above ground and extends to a maximum height of 23.5m above ground level. The height of Building 2 has been significantly reduced as compared to the originally submitted scheme of 16 storeys (64.3m above ground level).
  - The height and position of trees within the Site boundary remains broadly consistent with the proposals that were developed for the previous scheme design.

- The massing and location of cumulative surroundings within a radius of 400m from the centre of the site remains broadly similar to that tested in 2019.
276. Given the scope of the changes outlined above, the wind and microclimate conditions generated by the revised proposal are considered to remain similar to or improve on those set out in the 2019 ES. The existing versus proposed and cumulative assessment in the 2019 ES concludes that the wind conditions at the assessed points would be suitable for their intended use. This included walking conditions on Bermondsey Street, Snowfields and the new passage linking the two as well as walking/standing and sitting conditions around the new Snowfields building and public realm. The proposed environmental conditions would rely on appropriate mitigation such as tree planting and as such this would have been a conditioned requirement of any consent issued on the original submission alongside a Wind Mitigation Strategy in order to ensure that the predicted wind conditions are achieved.
277. As part of the Addendum ES, a desk study assessment has been undertaken on the revised proposals. This study was based on the revised drawings as well as the wind tunnel studies from the 2019 ES and the wind tunnel results from the Vinegar Yard development as well.
278. The proposed step arrangement on Building 1 is anticipated to help mitigate the effects of 'downrafting' from north easterly winds. Building 2 has been significantly reduced in height from 16 storeys to five and this is expected to have a beneficial impact on wind levels on Snowfields where funnelling effects from south westerly winds are expected to be less significant than in the 2019 scheme. Conditions are considered to be suitable for the intended use at assessed locations and additional mitigation is only required in two locations.
279. Location one is the new Bermondsey Yards thoroughfare where 'Standing' to 'Strolling' may be anticipated within the north end of the passage in the 'worst season', with 'Standing' in the summer. A significant effect may be expected however additional mitigation would be implemented in the form of a perimeter screen around the proposed seating areas within the north end of the passageway. No significant residual effects are anticipated.
280. Location two is the primary entrance to Building 2 where by 'Strolling' conditions may be anticipated in the worst season which is in excess of the acceptable limits for the intended use. Additional mitigation in the form of recessing the entrance by at least one metre and using inward opening doors is proposed. There would be no significant residual effects.
281. The desk study assessment has identified the potential for significant cumulative effects when considering the 2019 scheme in addition to the Vinegar Yard scheme however this was suitably mitigated by proposed tree planting. Wind tunnel testing as undertaken for the originally submitted scheme also demonstrated that wind conditions on Snowfields (and other areas) remain acceptable for intended uses in the presence of Vinegar Yard.
282. The revised proposals are of a significantly reduced scale and the wind levels are expected to remain similar to previously reported levels or improved. Further

wind tunnel testing has been undertaken in support of the Vinegar Yard development which supports the above findings. As such it is not anticipated that there would be any significant cumulative effects.

### Noise and vibration

283. Noise and vibration impacts have been considered as part of the 2019 ES which considers the key considerations to be noise and vibration effects from demolition and construction as well as associated traffic during this period. As with the originally proposed scheme, the scope of noise and vibration effects would be limited to construction noise effects. The construction methodology for the revised scheme is expected to be broadly the same, resulting in effects as originally reported in the 2019 ES. As such it is concluded that a detailed re-assessment of noise and vibration effects is not required.
284. Demolition and construction activities including associated traffic would give rise to some environmental impacts at nearby homes, commercial premises and Snowfields Primary School. These impacts are associated with the demolition and construction of the development and whilst they would be significant and adverse, they would be short term and temporary and relevant planning conditions would be imposed to offer mitigation and control hours of work as well as agreeing routes for construction vehicles.
285. The completed development is unlikely to result in any adverse noise or vibration impacts and other than standard conditions around hours of use and plant noise, no further mitigation would be required.

### Climate change

286. Whilst considered as part of the 2019 ES, a detailed re-assessment of the climate change effects is required due to the changes to the design and the adoption of new guidance for the assessment of Greenhouse Gas (GHG) emissions in EIA.
287. The impact of the development on Climate Change looks at both construction and existence/operational effects. The ES notes that there would be a net increase in emissions associated with the proposed development. This is typical for all large developments and is a result of the energy (and resulting greenhouse gas emissions) going into the new materials and transporting those materials to site, as well as any energy associated with construction activities and later operation of the development. These are all unavoidable requirements, however they have been minimised where possible through consolidation and sourcing materials sustainability where feasible.
288. The assessment considers the schemes embedded mitigation in the form of the Whole Life Carbon assessment and the key mitigation measures contained therein; the Circular Economy Statement and the waste hierarchy and recycling opportunities; the Energy Statement setting out the overall carbon reduction strategy for the development; and the Sustainability Statement that promotes low carbon mobility.
289. Guidance from the Institute of Environmental Management and Assessment states that any net emissions increase associated with a project, no matter how



small, is considered a significant effect. Hence the conclusion in the ES. This conclusion therefore recognises the seriousness of the climate emergency rather than the development being a relatively large source of greenhouse gas emissions. As noted above, measures have been taken and will continue to be taken to reduce emissions associated with the project and to minimise the effect as far as possible.

## **Energy and sustainability**

290. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 requires all developments to be net zero carbon with a minimum onsite reduction of 35% for both commercial and residential. Non-residential development should achieve 15 per cent reduction through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan Hierarchy (be lean/ be clean/ be green/be seen) and this must be demonstrated through the submission of an Energy Strategy with applications and post construction monitoring for a period of 5 years.
291. Southwark Plan Policies P69 and P70 reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. The policies reflect the London Plan approach of 'lean, green and clean' principles and requires non-residential buildings to be zero carbon with an onsite reduction of at least 40%. Any shortfall can be addressed by way a contribution towards the carbon offset green fund.

## Whole life cycle and carbon capture

292. Policy SI 2 – Minimising Greenhouse Gas Emissions of the London Plan requires developments to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken that would serve to reduce life-cycle carbon emissions.
293. Whole Life Cycle carbon emissions are those associated with the construction, use and eventual deconstruction of a development over its whole life cycle, considering impacts of construction materials, along with their repair, maintenance and replacements, as well as regulated and unregulated operational carbon emissions. A Whole Life Carbon Assessment and GLA Template was submitted.
294. The Whole Life Carbon Assessment follows the GLA template and covers:
- Reuse and retrofit of existing buildings
  - Use of recycled or repurposed materials
  - Material selection
  - Minimising operational energy use
  - Minimising carbon emissions associated with water use
  - Disassembly and reuse
  - Building shape and form and regenerative design

- Designing for durability and flexibility
- Local sourcing, minimising waste and promoting efficient construction including lightweight construction
- Optimising building life expectancy.

295. The proposed development would retain and refurbish two of the buildings whilst embracing high levels of material reuse on site. Materials have been selected to minimise carbon footprint on site and many passive design measures have been adopted. The key mitigation measures that informed the WLCA are as follows:

- Retention of suitable building elements;
- 50% GGBS content in concrete elements;
- 97% recycled content in rebar steel; and
- Low sub-structure material volumes.

296. The GLA have sought clarifications on some aspects of the Whole Life Carbon Assessment and the applicant has provided additional information to the GLA in this regard. This will be finalised prior to Stage II referral. The GLA have also requested a Post Construction Assessment be secured by condition. This condition will be attached to any consent issued.

### Carbon emission reduction

297. As previously stated, the London Plan requires a minimum 35% carbon reduction whilst the Southwark Plan requires a minimum 40% carbon reduction on site. Both policies accept that the difference between these targets and 100% can be balanced through a financial contribution to the carbon offset fund. The development would achieve a carbon reduction on the Vinegar yard Warehouse site of 63% and a carbon reduction on the Bermondsey Street site of 52% giving an overall site wide reduction 54% relative to the current 2013 Part L2A target emission rate (TER) for the building, using SAP10 carbon numbers. This would be accompanied by a carbon offset payment of £245,778 which would bring the development to carbon zero and achieve the aims of the policies of both the London Plan and the Southwark Plan. More detail on the strategy to achieve the overall 54% carbon reduction is set out below:

### Be Lean (use less energy)

298. The development would incorporate a range of passive and active design measures on both the Bermondsey Street site and the Vinegar yard Warehouse site that would reduce carbon emissions through energy efficient design and construction. Passive measures would include adapting building massing, layout and glazing to best respond to the local climate and annual sun path, with the aim of reducing energy demands and improving occupant comfort through limiting solar gain. Active measures across both sites would include:

- Improved fabric insulation.
- High performance glazing.
- Improved air tightness.
- High-performance LED lighting
- Highly efficient cooling and heat recovery ventilation systems.

### Be Clean (supply energy efficiently)

299. Currently there are no nearby district heating networks within 1km of the site that the development could connect to and no on-site CHP system is proposed given the negative carbon value that can be attached to CHP. As such, no carbon savings are reported from the 'Be Clean' stage of the energy hierarchy for either part of the site. The development would be futureproofed in order to ensure the potential to connect to a future district heating network should one become available.

### Be Green (Use low or carbon zero energy)

300. The proposed development would incorporate Air Source Heat Pumps as part of the Be Green design proposals. Heat pumps will be used throughout for the provision of heating, cooling and hot water. These heat pump systems will enable significant emissions savings over a conventional gas boiler heating system, particularly when factoring in the decarbonisation of the electrical grid

### Be Seen (Monitor and review)

301. The London Plan asks developers to monitor energy use during occupation and to incorporate monitoring equipment to enable occupants to monitor and reduce their energy use. In accordance with London Plan policies it is appropriate to secure post completion monitoring within the S106 agreement. The building would be required to be metered and a building management system would need to be used. This will be secured by condition. As built, the applicant will be required to commit to updating the contextual and energy performance data onto the Be Seen portal and would be required to confirm that the metering installation is installed and correctly calibrated. When operational, the applicant will be required to commit to submitting energy performance data annually for at least 5 years and where performance differs from estimated performance then they will be required to identify the cause and take action where necessary. These commitments would be secured in the legal agreement.

### Circular economy

302. Policy SI 7 Reducing Waste and Supporting the Circular Economy of the London Plan requires referable applications to promote circular economy outcomes and aim to be net zero-waste. These applications are required to submit a Circular Economy Statement to demonstrate:
1. How all materials arising from demolition and remediation works will be re-used and/or recycled.
  2. How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.
  3. Opportunities for managing as much waste as possible on site.
  4. Adequate and easily accessible storage space and collection systems to support recycling and re-use.
  5. How much waste the proposal is expected to generate, and how and

where the waste will be managed in accordance with the waste hierarchy.

6. How performance will be monitored and reported.

303. The applicant has submitted a Circular Economy Statement that sets out the approaches taken with regards to the existing building fabric, the updated development proposals, and contributions to the Circular Economy within the context of London as a whole. In terms of the buildings on site, the applicant is focussing on retention and refurbishment strategies with both the Vinegar Yard Warehouse and 40 Bermondsey Street. As well as being a sustainable approach with benefits for the overarching carbon objectives, this retention also seeks to build on the desire to retain the area's physical character and heritage (aesthetic). This would be achieved through retaining as much fabric as possible, including the facades and structural elements wherever possible.
304. For the elements of the development that would represent new build, the proposal has been designed with adaptability and flexibility strategies in order to build on the nature of the new development which is primarily mixed use offices/commercial. The applicant has identified that these uses typically undergo changes to building fabric more readily than purpose-built buildings for other uses. In terms of the London wide considerations, there is an emphasis on supporting increased pedestrian activity and walkability. At the masterplan level, this scheme can consider opportunities specific to how pedestrianisation might support or supported by a circular economy (e.g. building flexibility into the public realm).
305. The Circular Economy Statement covers the site sustainability approach including the strategic approach to the retained buildings and to the new build elements. Consideration has been given to designing out waste, designing for longevity, adaptability and flexibility and an end of life strategy.
306. The statement confirms that a post completion report will be submitted (which will be a conditioned requirement of any consent issued) with an updated Circular Economy Statement when the proposed development has been built out. This is part of the wider 'reporting outcomes' portion which will include the targets, commitments and outcomes that have been achieved. This will include updates of all tables included in the current submitted statement, such as the list of materials and the recycling/waste reporting but with the benefit of taking actual performance and finalised materials into account.
307. The GLA have sought clarifications on some aspects of the Circular Economy Statement with regards to a pre-redevelopment audit and an Operational Waste Management Plan and the applicant has provided additional information to the GLA to cover these points. This will be finalised prior to Stage II referral. The GLA have also requested a Post Construction Assessment be secured by condition. As detailed above, a Post Construction Report will be a conditioned requirement of any consent issued.

### Overheating

308. London Plan Policy SI4 Managing heat risk and Southwark Plan policy P69:

Sustainability standards set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The hierarchy is as follows:

- Minimise internal heat generation through energy efficient design; then
- Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- Manage the heat within the building through exposed internal thermal mass and high ceilings; then
- Use passive ventilation; then
- Use mechanical ventilation; then
- Use active cooling systems (ensuring they are the lowest carbon options).

309. Internal heat generation would be minimised through the use of low energy, high efficiency, Light Emitting Diode (LED) lighting will be used through-out the development to minimize internal heat gains. In order to reduce the amount of heat entering the building the facades have undergone design review to control the amount of solar gain entering internal spaces. The façade elements have been specified with a low solar transmission. Passive ventilation would be achieved by opening windows and low energy mechanical ventilation and air conditioning would be used.

310. To deliver the high-performance internal environment required by the client, a mechanical ventilation and cooling strategy has been recommended. All fresh air will be delivered by AHUs in the offices and basement changing areas and MVHR units in the ground floor reception and retail units. Cooling will be provided by air source heat pumps in all areas. The efficiency values of these systems will exceed the requirements of the 'Non-Domestic Building Services Compliance Guide'.

## BREEAM

311. Southwark Plan Policies P69 requires the development to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken, presented in the applicant's Sustainability Statement and which demonstrates that an "excellent" standard can be achieved which meets the policy requirement and is therefore acceptable.

## **Planning obligations (S.106 agreement)**

312. London Plan Policy Df1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

313. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

Planning Obligation	Mitigation	Applicant Position
Affordable workspace	1,572sqm at a 25% discount on market rent for 30 years with relevant rental staircasing.	
Archaeology	£11,171	
Carbon offset	£245,778	
Employment During Construction	Provide 35 jobs, 35 short courses and 8 construction industry apprentices for Southwark residents or make a payment of £167,750.	
Employment in the Development	Provide 86 sustained jobs for unemployed Southwark residents or make a payment of £369,800.	
Transport for London	The applicant must pay for any required re-location of the cycle hire docking station as well as an additional 15 cycle docking spaces. A contribution will also be required for updated/new legible London signage as well as a contribution to Healthy Streets. Transport for London to confirm figures at Stage II.	
Transport (site specific)	£42,032 towards reconstruction of the footway on Snowsfields and £5,520 towards Bermondsey Street  £270,000 towards bus improvements  £100,000 towards cycle hire provision;  £4,000 towards resurfacing works on Snowsfields.	
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £8,000 per tree.	

Admin	Charged at 2% of total.	
-------	-------------------------	--

314. The legal agreement should secure the following strategy documents:

- Affordable Workspace Strategy - including a marketing and management strategy;
- Construction Logistics Plan
- Delivery and Servicing Plan – including feasibility for delivery consolidation;
- Demolition and Construction Environmental Management Plan – setting out appropriate dust monitoring and noise assessment/monitoring;
- Employment Skills and Business Support Plan;
- Landscaping Strategy;
- Site Wide Energy Strategy – including full details of Be Seen monitoring and commitment to future proofing the site for onward connection to any future district heating network; and
- Travel Plan;

315. The Legal Agreement will also secure the following S.278 works:

- Repave the footway including new kerbing fronting the development on Bermondsey Street and Snowfields (London Borough of Southwark) in accordance with the SSDM requirements.
- Construct proposed vehicle crossover using materials in accordance with SSDM requirements.
- Reconstruct any redundant vehicle crossovers as footway along Bermondsey Street and Snowfields in accordance with the SSDM requirements.
- Creation of an extended raised table stretching across its intersection with the proposed 'White Lion court' pedestrian route, Bermondsey Street/Snowfields junction.
- Modifications to assist turning large vehicles, reconstruction of the footways on both sides of Snowfields and the segment of Bermondsey Street flanking this site.
- Elimination of the single redundant bollard on the adjoining stretch of Bermondsey Street and the disused vehicle crossover on Snowfields plus the construction of a loading bay and repositioning of the Santander cycle hire facility on Snowfields
- Install any new signage/posts related to the proposed vehicle entrance/exit located in Snowfields due to the one way system along the road. (Promote a TMO to amend any parking arrangements). Works to include road markings and signage.
- Change all utility covers on footway areas to recessed type covers.
- Upgrade street lighting to current LBS standards, including on private roads. Please contact Perry Hazell at [Perry.Hazell@southwark.gov.uk](mailto:Perry.Hazell@southwark.gov.uk) for further details.
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development.



316. In the event that an agreement has not been completed by 31 October 2023, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:
317. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Saved Policy 2.5 Planning Obligations of the Southwark Plan 2007, Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011) Policy 8.2 Planning Obligations of the London Plan (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

### **Mayoral and borough community infrastructure levy (CIL)**

318. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £772,801.57 and a Southwark CIL payment of £148,531.841 would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

### **Community involvement and engagement**

319. As part of the original submission the developer undertook an extensive, detailed and robust consultation with the local community (resident/business/stakeholders) both pre and post application submission. This includes five meetings with local business groups and two meetings with resident groups. Two public consultation events were held as set out below:

#### *St Thomas Street East public exhibition – 29 September and 1 October 2018*

320. This event was attended by 254 people and focused on the proposed framework for the St Thomas Street sites.

#### *Three Ten Bermondsey Ltd public exhibition - 10 and 12 November 2018*

321. This event was held by the applicant and focused on the proposed development on the Snowfields and Bermondsey sites. It was attended by 512 people

322. This was supplemented by the Councils own consultation exercise on the 2019 submission. As part of the revised proposals the developer has undertaken further public consultation. This consultation has taken in 2,181 residential and business addresses from the area outlined in the map below:



323. Ward Councillors as well as the Chair of the Planning Committee and the Cabinet member for Climate Emergency and Sustainable Development were invited to comment on the proposals as were the following neighbouring stakeholders:

- Old Bermondsey Neighbourhood Forum
- Team London Bridge
- Snowsfields Primary School
- Kipling Estate TRA
- CIT
- Guy's and St Thomas'
- Manna Day Centre

324. The consultation strategy and the consultation meetings/events are set out in the table below:

Activity	Date
Pre-amendment consultation	
Meeting with Councillor Helen Dennis and Councillor Martin Seaton	19/11/2021
<b>Public Consultation Stage 1</b>	
Introductory stakeholder invitations	26/11/2021
Exhibition invitation (1)	29/11/2021
Public exhibition (1)	09/12/2021
Public Webinar	11/12/2021
Update to project website (including information boards and feedback form available at the public exhibition)	10/12/2021
<b>Public Consultation Stage 2</b>	
Exhibition invitation (2)	09/05/2020
Stakeholder invitations	10/05/2022
Meeting with OBNF	18/05/2022
Public exhibition (2)	23/05/2022
Update to project website (including information boards and feedback form available at the public exhibition)	23/05/2022
Virtual meeting with ward councillors for London Bridge and West Bermondsey	15/07/2022

325. During the first stage of public consultation, a newsletter and survey was sent to the 2,821 addresses identified in the map above. The newsletter provided information on the proposed public exhibition for the 9 December 2021 as well as details of the public webinar of 11 December 2021. The public exhibition held on 9 December at the Artworks Classrooms on Westin Street was attended by 24 people including representatives of Team London Bridge and the OBNF. In order to reach as many people as possible, a webinar was organised and this was attended by 11 people.
326. The second stage of public consultation commenced on the 9 and 10 May 2022 when exhibition invitations were sent to the public and stakeholders. A meeting was held with the OBNF on 18 May 2022 and the public exhibition took place on the 23 May 2022. The public exhibition was attended by 32 attendees including Ward Councillors, Team London Bridge and representatives of the OBNF.
327. Again this was supplemented by the Councils considerable consultation exercise. This included sending 1,371 letters to local residents as part of a neighbour notification exercise. This exercise was initially undertaken on 11 October 2022 and repeated on 24 November 2022 following concerns that some neighbours had not received their initial letter.
328. Following the submission of summary information re-consultation was undertaken again on 27 January 2023 and further repeated again on the 22 March 2023. In addition to this, the revised proposals were advertised in The Southwark News on 6 October 2022, 9 February 2023 and again on the 23 March 2023. A public consultation meeting was held at the Councils offices on 23

February 2023 and attended by Ward Councillors.

329. Significant efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices.

### **Consultation responses from local groups**

330. The Victorian Society: The Victorian Society appreciates the amendments made in respect to the treatment of Vinegar Yard warehouse. However, the proposed additions to this building, and the other aspects of the scheme continue to raise serious concerns. The proposals to Vinegar Yard Warehouse still envisage the demolition of significant amounts of existing fabric, including the historic windows and staircase. The proposed extension would overpower the building. This would harm the significance of the building as non-designated heritage asset and as a positive contributor to the Conservation Area. Any acceptable extension to the building should not extend further than a single storey higher than the historic warehouse. The proposed Bermondsey Street building would harm the setting and significance of the Conservation Area, detracting from the prevalent low scale buildings. The nearby tall buildings are not a justification and in the context of the higher scale development it is even more important that the setting of the Conservation Area is preserved.
331. SAVE Britain's Heritage: The proposed development would cause substantial harm to both a designated (Bermondsey Street Conservation Area) and non-designated (Vinegar Yard Warehouse) heritage asset. The scale and height of the proposed development will cause significant harm to the fabric and significance of the designated Bermondsey Street Conservation Area and the modest but historic low scale buildings that characterise it. The alterations to the Vinegar Yard Warehouse, a local landmark and NDHA, to be substantially harmful and unjustified in heritage terms. The development proposes substantial demolition of original fabric which is intrinsic to the warehouse's character and significance, including its original windows and staircase. Whilst SAVE supports the principle of restoring this historic structure, the cumulative impact of the overbearing extension proposed and the loss of historic fabric claimed to be necessary to build it, are substantially harmful rendering the benefit of restoring elements of the structure nullified.
332. Old Bermondsey Neighbourhood Forum: The OBNF have formally objected on the basis that there has been inadequate consultation and publication of the application. The main element of the objection is the excessive height, scale and massing of the proposed development as well as inappropriate design which together would have a significant harmful impact on the character and setting of the Bermondsey Street conservation area and the Vinegar Yard Warehouse. The OBNF do not consider the site appropriate for a tall building and contend that planning policy does not support this either. Concerns have been raised about daylight and sunlight impacts as well as overshadowing of amenity spaces. Concerns are also raised about the accuracy of the information submitted and inconsistencies/misrepresentations on the plans.

333. The OBNF state that the Southwark Plan states any harm to a listed buildings or conservation area requires 'robust justification'. To offset the harm to the heritage assets identified above, inadequate justification has been offered in terms of public benefits. The affordable workspace offered is just the mandatory 10%. The public realm space at Vinegar Yard will be dark and windswept, and this development will block light from the public realm and garden to be provided by the adjacent CIT development. While the addition of a thoroughfare from Bermondsey Street to Snowsfields is welcome, it is indirect and closed from 9pm, making it of no benefit to pedestrian routes. Additionally it comes in the form of an arcade primarily for the benefit of the development's commercial tenants rather than the alley it claims to reinstate.
334. The scale of this development is detrimental to the historic environment as well as the micro-environment. It causes significant harm to several heritage assets while offering minimal public benefits in return, as such it should be rejected. Furthermore, the proper public consultation process has been circumvented by the device of calling it a revision rather than the materially different application that it obviously is. This is abundantly proven by the fact that the application has some 150 objections in the earlier form and, as of today, very few in the current form. This is despite the fact that only the degree of abuse to the surrounding historic environment has changed; it remains acute. There must be a proper consultation in accordance with the statutory requirement.
335. Team London Bridge: Comments have been provided covering the shared approach, taking into account the STSE Framework and the impact of the revised proposals on the bookends principle, pedestrian connectivity and hierarchy and the provision of active frontages which Team London Bridge consider could be increased. In terms of the design approach the revised proposals are welcomed as improvements to the original scheme, particularly the Vinegar Yard Warehouse. Concerns are still raised about the western elevation of the Bermondsey Street building and the need to consider the site in the context of potential future developments on adjacent sites.
336. There is the potential for conflict of use within the new pedestrian linkage as the space will be shared with cyclists at some points. Analysis of pedestrian flows should be undertaken and it should be noted that there are opportunities to improve the important junction of Bermondsey Street, Snowsfields, Crucifix lane and St Thomas Street.
337. The provision of office space is supported and is consistent with its location within the CAZ. Retail and active frontages could be improved and there should be an option for more than office use on the ground floor of the Vinegar Yard Warehouse. The improvements to greening and public realm are welcomed although there is the potential for increased greening through vertical planting, green roofs and green walls. There are concerns regarding the proposed public space, it includes aspects that lie on the adjacent site and demonstrates potential for servicing conflict although it is acknowledged that there are challenges in reconciling a scheme across two different development sites and an integrated approach should be taken, perhaps with a design competition. In terms of environment and sustainability, the scheme should move well beyond policy compliance to set exemplary sustainability standards. In the light of the pandemic it should also include use of filtration systems, set high standards for fresh air

provision in the building, make use of wider doors, lifts and routes, deploy touchless systems, and use anti-viral coatings on surfaces.

338. The development would have significant microclimate impacts and a full assessment should be undertaken. Servicing could have impacts on cyclists, pedestrians and traffic flows and the proposals should be brought forward within the context of a consolidation strategy within the whole framework area.
339. WSET: Objection on the basis that there would be disruption/disturbance, the design is not in keeping with the area, the building scale is disproportionate and would be damaging to the historic area. The proposed development would harm the operations of the school and lead to significant disruption for staff and students. Concerns are also raised as to daylight impacts.

### **Consultation responses from external and statutory consultees**

340. Environment Agency: No objections. It is advised that the applicant submit an amended Flood Risk Assessment that provides suitable levels in metres above Ordnance Datum (mAOD)  
**Response:** Noted, the applicant has addressed this issue.
341. Greater London Authority: The GLA fully support the proposed land use and the provision of affordable workspace. In terms of urban design, the proposed layout and contributions towards public realm and pedestrian permeability are welcomed. Whilst the height could be supported, further consideration of massing and materiality to the Bermondsey Street building is required. Further clarification on fire statement is required. The proposal would result in less than substantial harm to the significance of Bermondsey Street Conservation Area, and listed buildings within it. The GLA consider that the public benefits in terms of public realm improvements, provision of affordable workspace and employment creation could outweigh the identified harm.
342. In transport terms the proposed cycle and car parking is acceptable. Clarification on a replacement cycle hire docking station and servicing facilities for the site is required alongside an appropriate financial contribution. A travel plan, construction logistics plan, and a delivery and servicing plan should be also secured. Financial contributions are sought towards Legible London signage, improved local signage, and other infrastructure works. Clarifications are sought regarding the energy strategy, whole-life carbon assessment, circular economy, urban greening, flood risk assessment, drainage strategy, and biodiversity.
343. **Response:** The proposed affordable workspace would be secured in the S106 agreement. Officers note the GLA concerns with regards to the massing and materials for the Bermondsey Street building and consider that materials would be subject to conditions alongside detailed drawings and mock up conditions. Officer are supportive of the massing an, arrangement and detailed design of the Bermondsey Street building. Additional information has been provided to the GLA by the applicant in terms of energy, WLC, Circular Economy, UGF, drainage and biodiversity. Officer are satisfied that these clarifications suitably deal with the issues raised and this will be confirmed prior to Stage II referral. The relevant financial contributions and strategy requests will be secured in the S106 Agreement.

344. Historic England: On the originally submitted scheme, Historic England raised concerns with regards to the harm caused to Bermondsey Street Conservation Area by the proposed tall building above the historic warehouse at Vinegar Yard. Whilst Historic England welcomed the retention of the principal facades of the warehouse, they believe the 'skin deep' retention would have lacked authenticity and integrity, and the tall building rising above a partially retained Victorian warehouse would have appeared incongruous. Historic England have been consulted on the revised proposals and no longer raise any concerns. They have commented that they do not wish to offer any comments, that the Council should rely on its own specialist conservation advisors and that it is not necessary for them to be consulted again unless there are material changes to the proposal.  
**Response:** Officers note the Historic England no longer have any concerns with the proposed development following the revisions to the original scheme.
345. London Fire Authority: Whilst the London Fire Authority commented on the original submission, no response has been received to the re-consultation on the revised proposals. Previously the London Fire Authority requested that an undertaking should be given that access for fire appliances as required by Part B5 of the current Building Regulations Approved Document B and adequate water supplies for firefighting purposes would be provided.  
**Response:** Noted and agreed, the relevant undertaking will be secure by condition on any planning consent issued.
346. London Underground: No comment.  
**Response:** Noted.
347. Metropolitan Police: It is possible for the scheme to achieve Secured by Design standard and a condition should be added to that effect.  
**Response:** Noted and agreed, the relevant condition will be attached to any consent issued.
348. Natural England: No objection.  
**Response:** Noted.
349. Network Rail: No objections.  
**Response:** Noted.
350. Thames Water: No objections subject to conditions.  
**Response:** Noted, the relevant conditions which relate to water supply, proximity to water infrastructure and proximity to Thames Water assets.
351. Transport for London: TfL support the car free nature of the proposed development and have confirmed that the level of cycle parking would comply with the London Plan. TfL consider that the disabled car parking space provided on-street on Snowfields should be fitted with electric car charging facilities and this would be secured by condition.
352. Given the number of services available at London Bridge, development trips will be well distributed and consequently impacts are not considered, on balance, to be severely adverse. The Council would be supported in securing pooled section 106 contributions for bus service capacity. This should be discussed in detail with



TfL prior to determination of the application. The servicing for the Vinegar Yard Warehouse building is proposed for an on-street loading bay on Snowsfields, however this requires relocation of the Snowsfields cycle hire docking station.

353. At the previous consultation stage, an agreement in principle was given by TfL, with a caveat that a relocation space is identified nearby that is larger than currently so as to allow expansion of this station by 15 docking points, to accommodate growth in demand from this and other developments in area. Relocation would be at the expense of the applicant, with a contribution towards expansion in line with other nearby developments. The down time for the docking station during relocation would need to be minimised, given high demand in the London Bridge area. Since the previous consultation, demand for cycle hire has generally increased more than anticipated. An alternative location has also not been presented by the applicant. As such and given the low predicted servicing trips (6 per day) for the revised proposal, the applicant should consider other options for servicing the Vinegar Yard Warehouse building, either on-street from Snowsfields, for example in place of the proposed Blue Badge parking space or sharing the service yard of the adjacent Vinegar Yard development that was recently approved by the Mayor.
354. In line with other developments in the area, financial contributions should be secured for Legible London signage, a local map refresh, and TfL's St Thomas Street Healthy Streets scheme (two-way cycle track). A travel plan, construction logistics plan (CLP) and a delivery and servicing plan (DSP) should be secured, for approval by the Council in consultation with TfL.
355. **Response:** Financial contributions would be secured for Legible London signage, a local map refresh, and TfL's St Thomas Street Healthy Streets scheme (two-way cycle track) within the S106 agreement. The S106 would also secure the travel plan, construction logistics plan (CLP) and a delivery and servicing plan (DSP) and would be subject to written approval in consultation with TfL. Whilst a contribution has been agreed to extending the cycle hire provision by 15 spaces, discussions are still underway regarding the relocation of the cycle hire docking station and the potential for it to remain in situ (and be extended) subject to amendments to the servicing strategy for the Vinegar yard Warehouse. These issues will be finalised prior to Stage II referral.

## **Community impact and equalities assessment**

356. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
357. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
358. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:
1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
  - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
  - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
  - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

359. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

### **Human rights implications**

360. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

361. This application has the legitimate aim of xxxxx. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

### **Positive and proactive statement**

362. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

363. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

364. **Positive and proactive engagement: summary table**

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

## **CONCLUSION**

365. The redevelopment of both the Vinegar Yard Warehouse site and the Bermondsey Street site to provide a large scale commercial scheme is supported by current development plan policies. The development would create substantial additional employment floorspace and a consequent increase in jobs and employment opportunities as a result of providing an uplift in high quality office accommodation and a substantial increase in commercial floorspace on a central, sustainable, highly connected brownfield site. The development has the potential to provide up to 592 construction related jobs and up to 915 jobs once the development is completed. The provision of such an increase in employment on a site that benefits from the highest levels of public transport availability is fully supported.
366. The development would provide dedicated long stay and short stay cycle parking that would exceed both London Plan and Southwark Plan standards. This makes a significant contribution towards promoting sustainable transport. The cycle parking would be supplemented by high quality cycling facilities including showering facilities and changing rooms.
367. The proposal would not give rise to significant harm to neighbouring amenity by way of overlooking, loss of privacy, noise or disturbance. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.
368. It is recognised that there will be some adverse impact by way of daylight/sunlight impacts to Globe House, 8-20 Snowfields and the Tyers Estate. Given the small number of windows overall that would experience significant effects and the site specific circumstances set out above including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed development in redeveloping a currently under-used site, the provision of a significant new public realm, offices, retail, significant employment opportunities and the full refurbishment and meaningful re-use of

the Vinegar Yard Warehouse. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.

369. The public realm improvements with the creation of a new route linking Bermondsey Street and Snowfields would improve permeability and connectivity in the area and provide an eastern bookend to the St Thomas Street developments as well as providing a key element of the public realm. The proposal would provide an extensive improvement to the streetscape which would improve the experience for pedestrians, and provide for natural surveillance. The new public spaces are a particular benefit of this development.
370. Compared to previously, the revised scheme is a significant improvement, adopting a more sensitive approach towards the Vinegar yard Warehouse as a non-designated heritage asset and the Bermondsey Street conservation area. The proposed extension to the warehouse is high quality in terms of form, design and massing and sits well with the host building. The proposals will largely restore the warehouse to its original appearance and ensure its active use and long-term contribution to the local historic environment.
371. The proposal to relocate the tall building element onto the Bermondsey Street side of the site maintains a sizeable quantum of office floorspace uplift, but is located outside the conservation area. Rooting the high-rise structure within the existing, adapted no.40 and a matching replacement no.42-44 Bermondsey Street works well to mediate its street presence, maintaining the character and scale of the streetscape on the edge of the conservation area.
372. The Bermondsey Street building will form a high quality building within the townscape, landmarking the locally important junction of St Thomas Street, Snowfields and Bermondsey Street. Its scale is proportionate to its location and does not affect strategic views or unduly impinge on riverside panoramas. Locally, height and massing is not overbearing, whilst the building will read as part of the transition in building scales towards the London Bridge area and, conversely, form an effective end-stop to the emerging tall building cluster on the edge of north Bermondsey.
373. Part of the application site lies within the Bermondsey Street Conservation Area. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The proposed development would bring forward a fulsome restoration of an important local heritage asset which has fallen into a very poor state of repair. The development and associated restoration work would protect the warehouse for future generations and preserve its character and appearance whilst bringing it into a meaningful and sustained productive use.

374. Despite the revisions, the scale of the proposed buildings are in contrast to the immediate context of Bermondsey Street however the site has been identified in planning policy as being suitable for tall buildings and the architectural quality of the proposal is continues to be of the highest standards. Whilst there would be a degree of harm to the warehouse and conservation area, even allowing for the great weight that must be accorded to the conservation of designated heritage assets, it is considered that the heritage harm is significantly outweighed by the benefits of the scheme.
375. In balancing the harm against the benefits of the scheme, officers consider the significant public benefits to be:
- Provision of a significant uplift in employment floorspace and the creation of up to 915 new high quality jobs;
  - The provision of highly sustainable buildings that together provide a 54% reduction in carbon emissions;
  - The provision of 1,572sqm of affordable workspace provided at a discount of 25% on market rent levels and protected as such for 30 years;
  - The provision of a new route linking Bermondsey Street and Snowfields that will improve pedestrian linkages and support increased connectivity;
  - The refurbishment and restoration of the Vinegar Yard Warehouse;
  - The provision of a high quality public realm and improved landscaping and green spaces.
376. The development would achieve Carbon Zero status through a combination of an in lieu payment and a 54% carbon reduction on site. The on-site carbon reduction of 54% alongside the scheme being expected to achieve BREEAM Excellent will result in an energy efficient and sustainable building within the borough.
377. Developments of this size and nature have the potential for significant environmental impacts and therefore an Environmental Statement has been submitted. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. No impacts of a significant scale have been identified which are not capable of being mitigated through detailed design, through conditions, or through provisions in the S106 agreement.
378. The application is considered to be in compliance with the development plan, and emerging documents, when read as a whole, and it is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

## BACKGROUND INFORMATION

### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework	Environment Neighbour and Growth Department	Planning enquiries telephone: 020 7525 5403 Planning enquiries email:

and Development Plan Documents	160 Tooley Street London SE1 2QH	planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk
--------------------------------	--	---

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received.

## AUDIT TRAIL

<b>Lead Officer</b>	Steven Platts, Director of Planning	
<b>Report Author</b>	Terence McLellan (Planning Officer -Team Leader)	
<b>Version</b>	Final	
<b>Dated</b>	13 April 2023	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		13 April 2023